cy: O'Neill

Name: Jennie Rose

Address: 66 Jules Avenue SF CA 94112

Date: 8/15/00

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I am opposed to the proposed closure of 12 acres at Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Jennie Rose

Ronald Schmoltze
583 Green Ridge Dr. #3
Daly City, CA 94014
Home Phone (650) 991-3448
email: - ronschmo@pacbell.com

cj: O'Neill

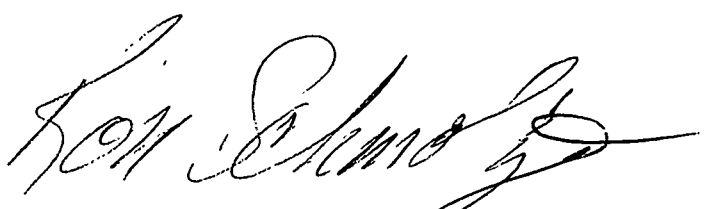
August 15, 2000

Dear Mr. O'Neill:

As a dog owner who goes to Fort Funston **Daily, I most strongly protest even the thought of closing this park to the public!** I won't even get into the illegality of such a move, rather I would like you to imagine a day like this past Sunday when the weather was beautiful and there were literally hundreds of people and their pets, not to mention other hundreds of people without pets, who were enjoying this very special place. A place which, I understand, was very generously given to the citizens of this area for urban recreation, **Not conservation, as some seem to think should be the priority!**

Lest I should sound like I am not sympathetic to the possible extinction of the cliff swallows and other fauna, I would like to state, that I have been a member of the Audobon Society and contribute to other groups dedicated to the unnecessary eradication of a species, (one wonders if skunks were endangered would anyone come to their aid?). I also am new to this area, (two years) and consequently have explored the cost at least 100 miles in both directions. So my question to you is: **Is this the only one or two miles in all of the hundreds of miles of coast line in California that will support and nurture these organisms? If so, the threat is obviously not from the joyous users of Fort Funston, but nature and natural selection itself!**

Sincerely



Ron Schmoltze, and several neighbors who are to lazy to write.

cy: O'Neill

Florence Sarrett
437 Diamond Street
San Francisco, California 94114

August 15, 2000

Brian O'Neill, General Superintendent
Golden Gate National Recreation Area
Bldg. 201, Fort Mason
San Francisco CA 94123

Dear Mr. O'Neill:

Re: Fort Funston Dog Walkers et al v. Babbitt et al

In accordance with the "Notice and Comment" phase in this matter, I am submitting thoughts on the restriction against walking dogs off lead at Fort Funston.

1. Public Safety. This is an acknowledged concern, easily addressed by cliffside fencing. But removal of the pavement on the Sunset Trail reduces safety and eliminates accessibility for visitors in wheelchairs, or parents with children in strollers. And permanent closure of "The Gap" on the beach would create a hazard for people caught there at high tide.

2. Scenic values. In the name of preserving the beauty of the unique site at Fort Funston, a blight of fencing now criss-crosses this visually stunning landscape.

3. Bank swallows. There are many anecdotes and considerable research which suggest that these birds are not disturbed by the presence of dogs or humans, and indeed may benefit from it. In fact, the reported decline in bank swallow colonies over the past several years coincides with the progressive substitution of native plants for ground-stabilizing iceplant, perhaps raising the question: which are worthier, native plants or bank swallows?

4. Integrity of government agencies. At many sessions of the Citizens Advisory Commission in the 70's, I remember assurances that there would be little change in existing pet policies. The January 1979 issue of the SFDOG newsletter contains the following report: "...dogs may be walked off lead...in the following areas: Fort Funston, Ocean Beach, Lands End, East and West Fort Miley, Baker Beach (north end only), Golden Gate Promenade/Crissy Field." And in the GGNRA archives I have seen a memo to the effect that there were 180 letters in support of off-lead recreation, versus 10 in opposition.

In the legislation creating this national park, in the transfer of Fort Funston and Ocean Beach from San Francisco to NPS, and indeed in the title of the park, it was clearly intended that *recreation* was to be given priority in this densely populated region.

NPS has not been a good neighbor to this host city and has broken faith with its citizens. It has disregarded its own requirement for public notice of significant changes, and has excluded the huge dog owning community from conferences at which input has been welcomed from Audubon and the Native Plant Society.

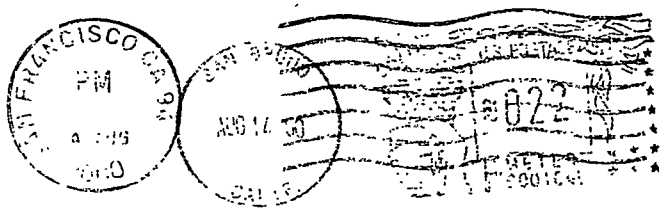
I join with other dog owners in asking you to exercise your discretionary authority and allow Fort Funston to return to the status of a fully off-lead recreation area.

Respectfully,

Florence Sarrett

Florence Sarrett

cc Citizens Advisory Commission



RECEIVED
AUG 17 2000
SUPERINTENDENT'S OFFICE

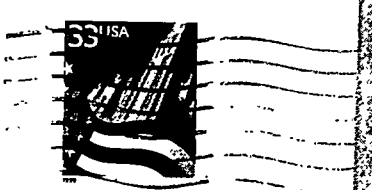
cy: O'Neill

Brian O'Neill, Superintendent
Golden Gate National Rrecreation Area
Building 201 Fort Mason
San Francisco, CA 94123

Re: Fort Funston (GGNRA) closure

94123/9998

Mr. & Mrs. James Krotzer
1628 18th Ave.
San Francisco
CA 94122-3413



RECEIVED
AUG 17 2000
SUPERINTENDENT'S OFFICE

cy: O'Neill

Brian O'Neill, Superintendent
Golden Gate National Rrecreation Area
Building 201 Fort Mason
San Francisco, CA 94123

Re: Fort Funston (GGNRA) closure

94123+1300
94123+1300

FOFUAR01428

This postcard is in response to GGNRA's newest proposal to permanently close acreage to public access, & to forbid off-leash walking at Fort Funston. Fort Funston is land mandated by congress to remain open recreational space.

As there may be "environment concerns" behind this newest GGNRA escapade, I am sure as rational, thinking human beings, an equitable solution can be resolved where everyone wins!

Sincerely, Maureen L Grimm

Dear Superintendent O'Neill, 8-11-2000

Congress mandated that the GGNRA lands be set aside as "open recreation space." Off-leash dogwalking has been a legitimate recreational activity at Fort Funston for almost 40 years. Dogwalkers are by far the largest users of Fort Funston but are continually left out of the planning process. The Park Service must bring groups together, including the Audubon Society, CA Native Plant Society, and the Fort Funston Dog Walkers, to find solutions to managing Fort Funston resources.

Thank you for your consideration.

Jim & CAROLE KOTEEN

FOFUAR01429

cj: O'Neill

1375 45th Avenue
San Francisco, CA 94122

August 14, 2000

Dear Sir

It never ceases to amaze me how you can get the brightest minds in the GGNRA together to figure out why a particular species of animal, bird or small lizard is endangered and the only solution you can ever come up with... is it must be the dogs.

So far you have blamed dogs for the fact that the snowy plover is on the endangered list, even though the area where dogs and plovers came into contact is the only area along the west coast where plover numbers are actually increasing. Interesting logic. Now you are blaming dogs for the fact that bank swallows are decreasing in number. Again this is despite the fact that dogs have been wandering around Fort Funston for decades without causing any decline in the swallows numbers, and despite the fact that those numbers started to decline only after the GGNRA decided to get rid of much of the vegetation in the area and "restore" natural plants.

Cleary science, reason, logic and other elements that pass for common sense in normal life do not apply to you. So, I shall resort to other less worthy but possibly more effective arguments. Starting today I shall be writing to all my congressional and state representatives, urging them to investigate the incompetent and irresponsible way you run your organization. I shall call for government cutbacks in funding for you. I shall urge everyone I meet not to give you money. In short, I shall hit you where it hurts. And I shall continue to do so until you involve the public in running public lands, until you stop your petty vendetta against dogs, and until you follow your own rules and the rule of law.

Yours truly,

Kevin McCormack

cy: O'Neill

Sherri Beyer

345 Noriega Street *San Francisco, Ca 94122* *415-731-2704*

August 14, 2000

Mr. Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets
Building 201, Fort Mason
San Francisco, California 94123

Dear Mr. O'Neill,

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades long tradition of off leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coast line.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Sherri Beyer

cc: O'Neill

August 14, 2000
69 Elm Hill Street
Springfield, VT 05156

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support new measures to protect the Fort Funston area of Golden Gate National Recreation Area. You are aware of the unique nature of the sandstone bluffs, revealing two million years of geologic history, and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Doing so requires efforts to reduce or eliminate graffiti and erosion from damaging use.

In addition, I am concerned about the continuing threat to rare wildlife, including bank swallows and burrowing owls, posed by permitting free-running dogs, which is against NPS policy.

I therefore urge you to end the habit of owners running unleashed dogs at Fort Funston and to tale steps to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Wallace M. Elton

Wallace M. Elton

Stephen T. Jones
1284 48TH Avenue
San Francisco, CA 94122
squibi@yahoo.com

8.13.00

cc: O'Neill

Superintendent
Golden Gate NRA
Bldg + Franklin Streets
Building 201, Ft Mason
San Francisco, CA 94123

Dear Superintendent,

I support year round closure for the habitat protection of bank swallows (Riparia riparia) in the Fort Funston Area.

Sincerely,
S T. Jones

cf: O'Neill

RECEIVED
AUG 17 2000
SUPERINTENDENT'S OFFICE

August 13, 2000

Superintendant
Golden Gate Nat. Park Recreational Area

Dear Sir's

I agree with all the reasons stated, for the closure of effort. 12 acres of Fort Funston year round.

It's such a small area of land to ask for in such a large Park -

It would help to inforce the law "All dogs on leash in National Parks" which is certainly not in effect here at the present time.

Restoring the native vegetation provides a more beautiful site for people to enjoy -

thank you for listening.

Sincerely yours

Virginia Krasevac

V. Krasevac
114 Bridgeview Dr.
San Francisco, CA 94124-2231

MARVIN E DUTTON
JANICE DOLE DUTTON
136 NATAQUA AVENUE
PACIFICA CALIFORNIA

Superintendent
Golden Gate National Recreation Area
Bay and Franklin Streets, Building 201
Fort Mason, San Francisco 94123

We support the proposed habitat protection closure at Fort Funston strongly. According to the map this is only a small portion of the area and protects valuable assets for everyone. The ubiquitous planting of ice plant has been a disaster state-wide, and the replacement of this unsightly plant is to be commended and supported.

The printed material on the proposed closure seems to indicate that one of the major problems is unleashed dogs. As dog owner and breeders we feel that owners unduly subject their dogs to danger by allowing them to run free. There is a busy highway close by and there are the cliffs. The dogs can be exposed to hazardous substances without the supervision of owners AND the terrain is subjected to much more wear and tear because the dogs roam off path and increase destruction of habitat. An off-leash dog's owner is hard-put to provide pooper scooper service because of the animals wide ranging.

The permanent closure of this area seems prudent and practical.

Marvin E Dutton

Janice Dole Dutton

Janice Dole Dutton

Friday, August 18, 2000

BRIAN O'NEILL, Superintendent
Golden Gate National Recreation Area, Building 201
San Francisco CA 94123

Dear Mr. O' Neill:

I am writing you to strongly support your proposal to close 12 acres of sand dune habitat at Fort Funston to off-trail recreation. This habitat is extremely sensitive, in that it contains one of only two nesting colonies of bank swallows, which nest on the cliff faces of the dunes. The closure will help prevent human disturbance, particularly by those with unleashed dogs, of the nesting swallows and will help to restore the very serious erosion of the cliffs.

Please do all you can to preserve this very beautiful, but threatened, bird and its habitat.

Sincerely,

Beth Hansen

Beth M. Hansen
900 Jeffrey Lane, Walnut Creek 94598

2892 Pine Street
San Francisco, CA
August 14, 2000

Dear Superintendent O'Neill,

I am writing to support measures to protect the Fort Funston area of the Golden Gate National Recreation Area. This unique and fragile area of sand dunes is threatened by free-running dogs who disturb the native plant and animal, especially the bank swallows California quail and burrowing owls.

I urge you to end the policy which allows dogs to be off leash in a National Park. We should be protecting this sensitive area of sandstone bluffs and the dune system.

Please keep me informed on the steps the National Park Service will take to protect the Fort Funston site.

Sincerely,

Lillian Hanahan

FOFUAR01437

GGNRA007612

Lindsay Kefauver 3739 20th Street, San Francisco, CA 94110
VISUAL RESOURCES 415/647-5649 FAX 415/647-5029

B. O'Neill
cy: M. Scott
D. Mannel
S. Prokop
K. Turner
C. Powell
M. Aguilar
N. Walthall

Brian O'Neill
Superintendent
GGNRA
Fort Mason, Building 201
San Francisco, CA 94123

10 July 2000

Dear Superintendent O'Neill:

On behalf of everyone who walks at Fort Funston - especially the dog walkers - I wanted to thank you for the wonderful new water fountain and two attached water bowls at the top of the sand ladder on the east side of Battery Davis.

Also the new wooden bag boxes are a huge improvement over the billowing bags tied to posts, those plus the lidded trashcans make the area so much more attractive and tidier.

Thank you to you and your staff, who made the decision to make these improvements, all of which greatly enhances everyone's enjoyment of the Fort.

Cordially yours,

Lindsay Kefauver

Lindsay Kefauver

B. O'Neill
Cy: M. Scott
C. Powell

3620 Market St., #5
San Francisco, CA 94131
July 10, 2000

M. Aguilar
S. Farrell
N. Wakefield

Brian O'Neill, General Superintendent
Golden Gate National Recreation Area
Fort Mason,Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I urge you to limit the area of Fort Funston that is open to dogs off leash, if not completely to comply with Regulation 36 CFR, which states that all pets must be on leash.

The coastal dune flora at Fort Funston is one of the few remnants of the once massive San Francisco dune complex. It deserves protection from all the impacts that a dog park would bring to a fragile area. I hope you will work to protect this scarce vegetation as a natural resource.

Sincerely,

Lawrence Maxwell

Lawrence Maxwell
larmax@pacbell.net

JOYCE DINSLAGE

2255-18TH AVENUE
SAN FRANCISCO, CA 94116

Phone (415) 681-0850

July 31, 2000

Brian O'Neill, Superintendent GGNRA
201 Fort Mason
San Francisco, CA 94123

Dear Mr. O'Neill,

I am writing this letter to you to state my concerns over the use of my favorite dog walking sites, Fort Funston in San Francisco and the Thornton Beach area in San Mateo County. I have been a resident of San Francisco my whole life (50+years) and have watched many changes to these wonderful areas over the years. I am torn between the emotions of the current controversy surrounding these parks due to the fact that I am a long-time member of the California Native Plant Society, the Audobon Society, and a dog enthusiast with two energetic, happy-go-lucky Golden Retrievers. I am also currently employed by the Park Department of San Francisco and work on occasion at the beach, as well as in Golden Gate Park. As a person who is involved with all aspects of the arguments on all sides of the problems surrounding these areas, I would like to voice my opinions.

First, I think that the restoration projects at Fort Funston are a great idea; however, they should be limited to the fringes of the property, i.e. the entrance, hillsides along Skyline Blvd., in front of the Visitor Center, and entrances to the paths, leaving the open space of the property for the responsible dog-owners that would like to give their pets some much-needed excercise off leash.. These people have shown their concerns for the land with scheduled clean-up days and pretty much police each other as to the behavior of each other's pets. Dog owner's are a special breed of people, love their dogs, nature and the outdoors. To take this away from them would be doing a great disservice to to the animals and people of San Francisco - where would they go?

On to my next great concern, that regarding the NUMBERS of dogs per person. I have seen "dog walkers" with 10-12 dogs, all running loose and out of control. There is no way one person can monitor or clean up after this many dogs at once. If they must exercise this many dogs. they need to do so by two's or three's at a time. My dogs and I have been charged by these herds, only to have the "walker" yell, "they're friendly", well, how does he know my dogs aren't agressive to this behavior? This is a situation that is an accident just waiting to happen, and must be addressed as soon as possible. It's not fair to those of us who are using this space for recreational purposes with our pets to be subjected to this devil-may-care attitude of these "professional" folks. If they want to "walk" this many dogs off leash, they need to buy their own property - it's called a "business expense"!

As far as the dogs disturbing the birds in the area, this is not a problem, its an excuse to fence off areas from the dogs. Quite frankly, the dogs are having far too much fun romping after tennis balls, frisbees and each other than to be concerned with a tiny bird.

In conclusion, I would like to put in a good word for your Rangers Bob Halloway and Roger Scott at Fort Funston who were very helpful and pleasant to me and my dogs.

cc: The Honorable Dianne Feinstein
The Honorable Nancy Pelosi
Willie Brown, Mayor of San Francisco
The Honorable Tom Lantos
The Honorable Barbara Boxer

Sincerely,
Joyce Dinsalge

Joyce Dinslage

cy: O'Neill

FRIEDMAN/FITZER FAMILY
Susan, Gene & Nicole
40 Agua Way
San Francisco, CA. 94127
415 664 6600 TEL

August 17, 2000

Dear Mr. O' Neill:

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use. In legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs, They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a wind blown but gloriously beautiful section of San Francisco coast line.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land and contribute to the maintenance of our local environment.

In a huge front page article of today's SF Chronicle in the "San Francisco and the Bay Area" section of the paper, San Francisco boasts about being the most humane city in the US. Fewer cats and dogs are euthanized here than any other US city.

I, for one, am proud to live in a city that humanely saves abandoned dogs & cats, spays them at no cost and finds them homes. I am proud to live in a city that provides me with a beautiful off-leash location to walk my dog. I take all my out-of-state visitors and show off the beauty of San Francisco and Fort Funston and I, too boast that not only do I live in a city that spares its pets, but it also allows me the freedom to walk, run and play with my dog *off-leash* in a beautiful setting. My out-of-state friends and family envy the fact that I get to walk with my dog *EVERY SINGLE DAY* in such a beautiful place.

Studies have shown that pets are a major source of stress reduction. They bring fulfillment to the elderly and joy to children. I need my time with my dog at Fort Funston to "chill out." I am already stuck in daily traffic jams, waiting in long lines at the supermarket and post office, holding for a machine to transfer me to another machine on the telephone while I'm calling my health provider (bank, credit card company, water department, phone company) to try to figure out what the charges are that I don't recognize on my bills, just to mention a few of the stresses in my life . . .

Please don't cram us in at Fort Funston. Please continue to let there be a place where I can walk with or without my dog, enjoy the beauty that San Francisco has to offer and have a few moments when life feels good. Do not close down 12 acres of Fort Funston to the public, *please* . . . my sanity couldn't take it. Thank you.

Susan Friedman
Gene Fitzer
Nicole Fitzer and Jena, our dog !

FOFUAR01441

Ronald Schmoltze
583 Green Ridge Dr. #3
Daly City, CA 94014
Home Phone (650) 991-3448
email: - ronschmo@pacbell.com

cy: O'Neill

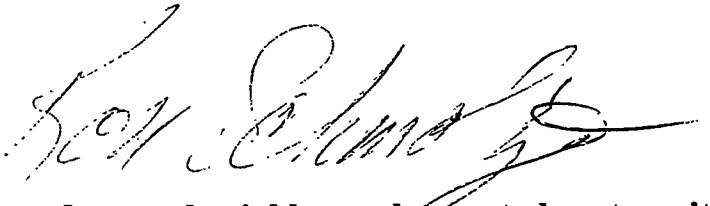
August 15, 2000

Dear Mr. O'Neill:

As a dog owner who goes to Fort Funston **Daily, I most strongly protest even the thought of closing this park to the public!** I won't even get into the illegality of such a move, rather I would like you to imagine a day like this past Sunday when the weather was beautiful and there were literally hundreds of people and their pets, not to mention other hundreds of people without pets, who were enjoying this very special place. A place which, I understand, was very generously given to the citizens of this area for urban recreation, **Not conservation, as some seem to think should be the priority!**

Lest I should sound like I am not sympathetic to the possible extinction of the cliff swallows and other fauna, I would like to state, that I have been a member of the Audobon Society and contribute to other groups dedicated to the unnecessary eradication of a species, (one wonders if skunks were endangered would anyone come to their aid?). I also am new to this area, (two years) and consequently have explored the cost at least 100 miles in both directions. So my question to you is: **Is this the only one or two miles in all of the hundreds of miles of coast line in California that will support and nurture these organisms? If so, the threat is obviously not from the joyous users of Fort Funston, but nature and natural selection itself!**

Sincerely



Ron Schmoltze, and several neighbors who are to lazy to write.

August 16, 2000

FORT FUNSTON - SAN FRANCISCO, CALIFORNIA

Please have all the fences removed. The GGNRA continues to build more fences in the name of the preserving the environment. Hog wash! This is recreation area for people to enjoy, in a large metropolitan area, not a animal or bird sanctuary, nor do we want it to become one. This area consists of nothing but sand dunes. We are not talking Yosemite here. NO MORE FENCES, and take down the existing ones. THANK YOU.

Margaret McNamara, 825 30th Ave., San Francisco, CA 94121

FOFUAR01443

Amy Chow
2359-33rd Ave.
San Francisco, CA 94116

August 16, 2000

Superintendent
Golden Gate NRA
Bay and Franklin St.
Building 201, Fort Mason
San Francisco, CA 94123

Dear Superintendent to GGNRA:

I am very distraught to hear of the proposal to close off another 2 acres of Fort Funston. As a dog lover, of course I love all wildlife also and believe that they deserve their space also. But yet I remain baffled why the swallows should require 26 acres for a breeding ground. I am sure there are other coastal areas that they have established breeding grounds.

Our family has always enjoyed the open space, fresh ocean air, and the friendly atmosphere of both dogs and dog owners alike that we must object to the additional closure. We wish to request that the previous closed area be removed or a new area to be available for use to avoid the possible damaging effect of frequent use of one area.

Your attention to the above would be greatly appreciated.

Sincerely,

Amy Chow

cy: O'Neill

DENNIS J. LENZ, CPA
36 CEDAR STREET
AMITYVILLE, NEW YORK 11701
516-691-3827

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

August 12, 2000

Dear Superintendent O'Neill:

I am writing to express my support for measures to protect the Fort Funston area of Golden Gate National Recreation Area. I understand that only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Certainly, unimpaired does not mean being scarred with graffiti or eroded by tracks and trails.

I do not understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston with respect to free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Thank you for your consideration of my concerns.

Sincerely,

Dennis J. Lenz

Dennis J. Lenz

CERTIFIED PUBLIC ACCOUNTANT

cy: O'Neill

August 12, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201, Fort Mason
San Francisco, CA 94123

Dear Mr. O'Neill:

I object to the recent closures at Fort Funston. The public process has been lacking and the measures unnecessary for the level of protection required. There has been a failure to recognize that this is a national recreation area as well as a wildlife habitat.

The fences are a barrier to experiencing what is most special about the area.

If we need to protect the bank swallows, fencing should be near the cliff face, above the burrows; This would protect the birds and create this public safety as well. We know that fence CAN be erected in the dunes because the park service has accomplished this task in the past.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

Emily Rosenberg
6114 LaSalle Ave, Oakland Ca 94611

cy: O'Neill

Dear Mr. O'Neill:--

August 12, 2000

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

G. McBerger

Return address: 905 Church St.
SF, CA 94114

The Ft. Funston Dog walkers deserve much credit for good conduct in this area! This is part and particle of good citizens realizing their responsibility in an area reserved for recreation purposes for all. Thank you for your interest!

RECEIVED

AUG 1 0 2009

SUPERINTENDENT'S OFFICE

cc: O'Neill

Dear Mr. O'Neill:

This war between GGRC & dog owning tax payers seems specious. It is "The way you want it to look" vs. the health & happiness of taxpayers pets. Surely here can be compromise. There always has been in the past.

Please, let's all put our egos aside and do what's best for all the creatures involved.

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

Krandall Kraus
Paul A. Borja
Ronald Baumhover

664 Chords St
94114-2627

FOFUAR01448

cy: O'Neill

Dear Mr. O'Neill:

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

Melissa Lee
2703 Cornet Blvd
Belmont, CA 94002

RECEIVED

AUG 10 2000

SUPERINTENDENT'S OFFICE

cy: O'Neill

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Bryan W. Mulvaney

5215 W Peoria Ave #115
Glendale, AZ 85302
(623) 842-4512

FOFUAR01450

cy: O'Neill

Dear Mr. O'Neill:

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Mathilde Maddux

Return address:
4505 A 25th street
San Francisco
CA 94114

if more areas get closed to people and their dogs, I am afraid the SPCA will acquire more dogs than they know what to do with. If I cannot exercise my dog she will go back to where she came from: the SPCA!

cy: O'Neill

Dear Mr. O'Neill:

As a supporter of National Park Trust and National Park Conservation Association for many years,
I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

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Sincerely,

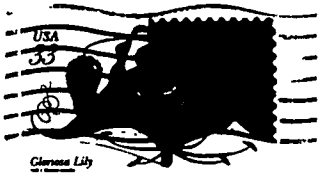
George Senyk

Return address:

Dr George Senyk
2319 32nd Ave
San Francisco CA 94116-2207

Dr George Senyk
2319 32nd Ave
San Francisco CA 94116-2207

SAN FRANCISCO CA 941
PM
9 AUG
2000



Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201, Fort Mason
San Francisco, CA 94123

94123/1380

FOFUAR01453

cy: O'Neil

Cheryl A. Spencer
1319 Cheyenne Blvd.
Colorado Springs, CO 80906

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123
Fax: 415-561-4710

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Cheryl A. Spencer

cy: O'Neill

August 10, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

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I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Lynne Jeffries
24792 Eaton Lane
Laguna Niguel, CA 92677

cy: o'Neill

RECEIVED

AUG 10 2000

Dear Mr. O'Neill:

I JUST ADOPTED A DOG FROM SPCA. MY NEW FRIEND NEEDS A PLACE TO RUN FREELY WITH HIS BUDDIES. PLEASE, PLEASE LEAVE THE FORT OPEN TO OFF-LEASH USE!!

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

Joan McClure

Joan McClure
240 CLARENDON BLVD
SF CA 94127

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201, Fort Mason
San Francisco, CA 94123

94123-1304 27

FOFUAR01457

cy: O'Neill

Dear Mr. O'Neill:

FORT FUNSTON IS ONE OF THE LAST PLACES DOGS CAN RUN FREE AND LEARN TO SOCIALIZE WITH OTHER DOGS AND PEOPLE. IS IT REALLY NECESSARY TO FENCE OFF THE ENTIRE PARK, LEAVING ONLY A CONCRETE TRAIL FOR THE DOGS TO WALK ON. HOPEFULLY YOU WILL RECONSIDER YOUR DECISION TO CLOSE OFF MORE OPEN AREA.

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

BARRY KURPINSKY
40 OAKMONT DRIVE
DALY CITY, CA 94015

cy: O'Neill

Dear Mr. O'Neill:

I just decided to become a dog owner. My new puppy needs a place to run freely. Fort Funston is a wonderful place to exercise my dog and to meet people. I need Fort Funston as an off-leash park. What would I do without it??!!??

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

K. Snow

KRISTY SNOW
553 PACIFIC AVE
SAN FRANCISCO CA
94133

cy: O'Neill

Dear Mr. O'Neill:

The Fort Funston dog walkers and visitors take very good care of the area by supplying bags and conducting monthly clean ups. By my experience, I have not seen aberrant of the area or dogs attacking wildlife.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely, Ellen Ostermann

Ellen Ostermann
1269 Rosita Rd
Pacifica CA 94044

RECEIVED

AUG 0 9 2001

SUPERINTENDENT'S OFFICE

ag: O'Neill

Dear Mr. O'Neill:

I believe the Park Service needs to re-assess the recent closures of areas of Fort Funston.

The ~~to~~ apparent inconsistencies and seemingly random actions in the face of public disapproval indicate that the ~~other~~ agenda of people running park activity seem to be unconcerned with ~~the~~ both the environment and Public opinion.

I also have reason to believe ~~that~~ the native plant Program is changing the habitat ~~for~~ of the bank Swallows, not the presence of humans and dogs, since they co-existed quite well for many years.

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

James B. Frame

James B. Frame

25 Duncan St.

San Francisco, CA 94110

cc: O'Neill

Dear Mr. O'Neill:

I have had visiting family members come with me to Ft Fun "just to experience walking along with the dogs - they don't even have dogs & loved it here.

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

Melissa Hower
629 Florence
Daly City
CA 94014

cy: O'Neill

Dear Mr. O'Neill:

LIVING IN A BIG CITY CAN BE LONELY. HAVING THE ABILITY TO WALK MY DOG OFF-LEASH WITH OTHER DOG OWNERS MAKES ME FEEL A PART OF A COMMUNITY. DONT ELIMINATE MY SOCIAL LIFE!!!

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

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Sincerely,

WDMcClure

Wendy McClure
240 Clarremont Blvd
San Francisco CA
94127

cy: O'Neill

RECEIVED

AUG 0 9 2000

SUPERINTENDENT'S OFFICE

Dear Mr. O'Neill:

I'VE MET SOME OF MY CLOSEST AND DEAREST FRIENDS WALKING MY DOG OFF-LEASH AT FORT FUNSTON. PLEASE DO NOT CLOSE THE PARK TO OFF-LEASH USE, I'LL LOSE CONTACT WITH MY BEST FRIENDS.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Wendy McClure

Wendy McClure
240 Claremont Blvd
San Francisco Ca
94127

FOFUAR01464

GGNRA007639

cy: O'Neill

Dear Mr. O'Neill:

As a birder and a dog owner + user of ft. funston, I am really concerned that you re-open more of the park for us to enjoy. I do not believe this creates a threat to the birds.

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

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Sincerely,

Deni Asnis
152 Leopard Ave
SF CA 94131

cy: O'Neill

RECEIVED

AUG 0 9 2000

SUPERINTENDENT'S OFFICE

Dear Mr. O'Neill:

PUBLIC INPUT IS CRITICAL WHEN A MUCH USED PARK BECOMES AN ISSUE. DOG WALKERS USE THE PARK MORE THAN ANY OTHER GROUP, WHY ARE WE NOT BEING ASKED TO PARTICIPATE IN THE DISCUSSION?

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

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Sincerely,

[signature]

[illegible] Zendarski
240 Clarendon? Blvd
SF, CA 94127

FOFUAR01466

cy: O'Neill

Dear Mr. O'Neill:

As a taxpayer & property owner in SF, I feel that I am entitled to a beach without restrictions for myself, my family, & my dogs.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

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Sincerely,

Ranna Brandt
734 14th St. #4
SF CA
94114

cy: O'Neill

Dear Mr. O'Neill:

We strongly oppose the decision to close 12 acres at Fort Funston. I count on your diligent efforts to oppose this measure.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

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Sincerely,

HERNÉ RODRIGUEZ
734 14TH ST. #4
SF CA 94114

RECEIVED

AUG 0 9 2005

SUPERINTENDENT'S OFFICE

ay: O'Neill

955 Ashbury Street #25
San Francisco, CA 94117

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201
Fort Mason
S.F., CA 94123

Dear Mr. O'Neill,

I am writing to voice my disappointment in your potential decision to close more of Fort Funston. San Franciscans and visitors enjoy visiting Fort Funston. Fencing in more acreage of Fort Funston seems unwarranted.

I love Fort Funston and don't want to see 12 more acres of it fenced. I think it is a disgrace that we will not be able to enjoy the Fort and that our recreational access at Fort Funston will be drastically limited.

If you plan on closing the Fort, please provide me with the scientific basis that merits for so large a closure. Knowledge of the facts will show that a closure is not necessary.

Sincerely,

Bruce Rizzo

cc: SFDOG
P.O. Box 31071
SF, CA 94131

cy: O'Neill

Dear Mr. O'Neill:

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

Vivian Rae
2703 Coronet Blvd
Belmont, CA 94002

RECEIVED

AUG 0 9 2000

SUPERINTENDENT'S OFFICE

cy: O'Neill

Dear Mr. O'Neill:

Please keep the best dog park in the country open (with no more closures) me & my 2 pugs, Corky & Smokey. We abide by all rules and believe that this place brings out the best in the tourists, locals & animals who come here.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

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Sincerely,

Melissa Flores
624 Florence
Daly City
CA 94014

FOFUAR01471

GGNRA007646

cy: O'Neill

Dear Mr. O'Neill:

I'M NOT A DOG OWNER BUT I LOVE DOGS. I'VE ENJOYED WATCHING THE DOGS PLAY OFF-LEASH AT FORT FUNSTON. IT PUTS A SMILE ON MY FACE TO SEE A SMILE ON THE DOGS FACES. PLEASE DON'T CLOSE THE FORT TO OFF-LEASH USE.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

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Sincerely,

JL SEARS
553 PACIFIC AVE
SAN FRANCISCO CA 94133

FOFUAR01472

cy: O'Neill

Sue Fitzpatrick
20410 Kirkmont Dr.
Saratoga, CA 95070

9 August 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill,

I am writing to support measure to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting these dunes within Golden Gate National Recreation Area "Unimpaired for the enjoyment of future generations>" Unimpaired does not man resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Parks Service has failed to enforce its own clear regulations of Fort Funston regarding free-running dogs. Is Golden Gate National Recreation Area the only unit of the National Park System that openly ignores the rules, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Sue Fitzpatrick

cy: O'Neill

RECEIVED
AUG 0 8 2000
SUPERINTENDENT'S OFFICE

Superintendant Brian O'Neill
GGNRA - National Park Service
Fort Mason. Bldg 201
San Francisco CA 94123

8/7/00

Dear Superintendant O'Neill,

I am writing in support of GGNRA efforts to protect the Bank Swallow nesting site at Fort Funston. This area is unique and also essential to this threatened species. The Fort Funston site is 1 of only 2 successful nesting sites on the entire West Coast. Listed as a threatened species under the California Endangered Species Act, it needs protection by the GGNRA management. It should have an extended area roped off to keep out dogs and people.

I saw dogs running free at the base of some active nesting holes in a recent visit.

The dogs at Fort Funston have ruined the area for non-dog owners. We parked at the Visitor Center area recently, saw all the dogs on a weekday, and left after 20 minutes. This has become a dog run, not a national park for all.

Thanks for your attention.

Sincerely,
Myra Ulvang

FOFUAR01474

GGNRA001548

Myra Ulvang
192 Seal Rock Dr Apt 2

cy: O'Neill

Dear Mr. O'Neill:

I object to the recent closures at Fort Funston.

The newly erected fences keep people from enjoying what is the most scenic area of the Fort.

If fences are shown to be needed to protect the bank swallows, these should be near the cliff face, above the burrows; this solution would address public safety as well. The Park Service has shown it can erect fences even on dunes.

We are anxious to find a solution that allows all park visitors to enjoy their recreational activities including off-leash dog walking, hiking, bird and whale watching, or just sitting to admire the view. This can be done while also protecting existing park resources.

Sincerely,

Maria L. Nowicki
James R. Gilliver
2324-14th Ave.
San Fran, CA 94116

Dear Mr. O'Neill: cy: O'Neill

I STRONGLY object to the recent closures and proposed NEW closures at Fort Funston. The fences keep tax paying citizens from enjoying what is the most scenic area of the Fort. In fact, the fences HAVE NOT benefited the Bank swallow population. The further proposed changes should be near the cliff face above the burrows. This would address public safety as well as the Bank swallows while allowing those of us that use the Fort on a regular basis, we the predominant users of Fort Funston, we the organization that takes very good care of the area by supplying litter bags and conducting monthly cleanups, the continued access we desire and deserve.

Thank you for listening.

Beatriz Martinez

----------(end of letter)----------

PF 1 = Help 2 = Exit 3 = Return 4 = Query 5 = Action 7 = Backwa

B Mahoney
786 Dolores
SF, Ca 94114

SUPERINTENDENT BRIAN O'Neill
Golden Gate NATIONAL Recreation Area
Bay + Franklin streets
Building 201, FORT MASON
SF, Ca 94123

FOFUAR01477

GGNRA007652

cy: O'Neill

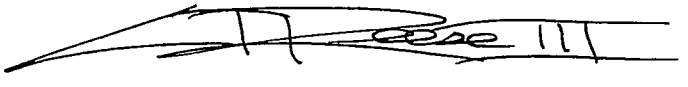
Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,



Cadwalader T. Reese III
1153 Rumrill Blvd. #73
San Pablo, CA 94806
Tegthemigrator@aol.com

cy: O'Neill

Diane S. Hert
6563 Ethel St. N.W.
Canton, Ohio 44718
330-498-5735

August 8, 2000

Via Telefax 415-561-4710

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5% of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

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I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Diane

Diane Hert

cy: Oneill

LYNN PETRA NELSON
131 Corwin Street
San Francisco CA
94114-2343
VOICE: 415-626-2858
FAX: 415-626-5807
CELL: 415-902-8021
Email: lynpetran@aol.com

August 8,2000

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill,

I am writing to protest the closure of 12 acres of Fort Funston. I am a senior divorced woman, living alone in San Francisco with my companion dog. I feel our quality of life in San Francisco would be effected if we could not continue to jog on the beach for fresh air and exercise.

Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and our dogs. We go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine and owner socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Lynn P. Nelson

Lynn Petra Nelson

cc: The Honorable Nancy Pelosi, Diane Feinstein,Tom Lantos

cy: O'Neill

Superintendent,GGNRA
Bay and Franklin Sts. Bldg. 201
Ft. Mason, San Francisco, 94123

Dear Mr. O'Neill

As a person who has reverence for all life, I do not dispute the fact that we all need to do whatever possible to preserve our wildlife and native plants. However, as a dog lover and user of Ft. Funston to run my dog off-lead I would like you to know how important it is for dogs to be allowed to run freely, even if the area is curtailed.
I am really asking that dogs not be put on-lead in order to use the fort. Dogs that are not properly socalized and exercised off-lead present a problem of agression and other behavioral problems.
I appreciate your attention to this letter and will look forward to the meeting on August 29, 2000.

FOFUAR01481

Sincerely,
Diane D. Grant
Diane D. Grant
6 Lighthouse Rd.
Half Moon Bay, Ca. 94019

GGNRA007656

JOYCE NICOLAIT
95 RED ROCK WAY M108
SAN FRANCISCO CA 94131

cy: O'Neill

August , 2000

Brian O'Neill, Superintendent
Golden Gate National Recreation Area
Building 201 Fort Mason
Bay and Franklin Streets
San Francisco, CA 94123

Re: Fort Funston (GGNRA) closures.

Dear Superintendent O'Neill:

Please reconsider your current misguided policy of turning Fort Funston into a botanical preserve. Your proposed closures far exceed what is needed to protect the bank swallow and deprives hundreds of people the opportunity to enjoy the park. Why not allow the existing, hardy, use-appropriate ice plant to remain in the heavily used areas of the park and plant the more delicate "native plants", which, by the way, are also less effective at erosion control, in the little-used areas flanking the eastern side of the park.

Your misguided policy is at odds with the vast majority of users at the Fort, dog walkers, who rely on this last remaining off-leash area. We believe that this heavily-used and much needed unique urban park should receive a different managerial perspective than that applied to the rural wilderness.

Sincerely,

Joyce Nicolait

Cc: The Honorable Diane Feinstein
The Honorable Barbara Boxer
The Honorable Tom Lantos
The Honorable Nancy Pelosi
Willie Brown

cy: O'Neill

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Building 201, Fort Mason
Bay & Franklin Streets
San Francisco, CA 94123
Fax: 415-561-4710

Dear Superintendent O'Neill:

We are writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. We do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only five percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

We cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

We urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system.

Sincerely,

Joseph and Janet Holly Romine
P.O. Box 4662
Tulsa, OK 74159-0662

cy: O'Neill

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123
Fax: 415-561-4710

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Michele L Nealen

Michele L. Nealen
617 S. Durham Street
Baltimore MD 21231
mln@jhmi.edu

cy: O'Neill

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

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I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,
Ross Grainger.

cy: O'Neill

7 August 2000

Brian O'Neill
Superintendent
GGNRA
Bay & Franklin, Bldg 201
Fort Mason, San Francisco 94123

RE: Fort Funston--Proposed Permanent Closure

Dear Mr. O'Neill:

The statements regarding public safety used to support GGNRA's proposal are extremely misleading. I am writing to object strenuously to their misuse to support GGNRA's proposal for further closures.

As a daily user of Fort Funston, I have witnessed at least five of the cliff rescues to which your proposal refers. They all occurred in the first quarter mile of the Sunset Trail, not even in the proximity of the proposed closure.

GGNRA's signage regarding unstable cliffs is on the Sunset Trail in the area where I have seen rescues. I believe this is further evidence of the location of rescues, i.e., **not in the area of the proposed closures.**

The frequency with which rescues have occurred is also misleading. GGNRA has successfully restricted dog walking outside of Fort Funston in recent years, thereby funneling this activity to this last bastion. Increased use has naturally led to increased rescues. Still by GGNRA's own reckoning 16 rescues in 1999 represents a mere .002% of the 750,000 visits to Fort Funston. Surely this small number cannot be considered excessive, given that the entire bluff was undermined by high tides during the El Nino storms of 1998.

Furthermore, GGNRA's proposal reports a 36% decrease in the number of rescues from 1998 to 1999. Surely this decrease is attributable to the warning signs that were installed in 1999. If GGNRA had a sincere interest in public safety these signs would have been installed a year earlier, when the cliff structure was undermined by weather.

In fact, if public safety were GGNRA's sincere concern, it would not further restrict the areas available to users, thereby increasing the traffic in the areas unsafe to them.

Once again, GGNRA proves itself dishonest in its dealings with the users of its parks. It may successfully fool those who don't use its parks, but it will not fool the users.

Yours sincerely,

Mary McAllister
2484 21st Avenue
San Francisco, CA 94116

cy: S. Sneen
~~Hassett~~
O'Neill

Author: Mike Moser at NP-GOGA-GGNPA
Date: 8/7/00 9:28 AM
Normal

TO: Brian O'Neill at NP-GOGACC: Carol PrinceSubject: Unleashed Dogs at Ft. Funston -------
---------- Message Contents

Brian and Carol,

This message was sent through the Association's web site to "tellmemore@ggnpa.org". It was "cc"d to "takeaction@npca.org".

Mike Moser

---------- Forward Header ----------
Subject: Unleashed Dogs at Ft. Funston
Author: "Trish Kaspar" <trishka1@earthlink.net> at INTERNET-GATEWAY
Date: 8/6/2000 7:31 PM

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123
Fax: 415-561-4710

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden GateNational Recreation Area. You're well aware of the unique nature of the sandstone bluffs and sand dunes of Fort Funston; after all, you know the projects that continue there on a weekly basis. Only 5 percent of the San Francisco dune comp lex remains, and the National Park Service is charged with protecting those dune s within GGNRA "unimpaired for the enjoyment of future generations." Unimpaireddoes not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (lis ted as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to protect the Ft. Funston site. Thanks very much.

Sincerely,

Patricia J. Kaspar
San Mateo, CA

cy: O'Neill

Laura A. Woodry
6219 North Traymore Avenue
Azusa, California 91702-4139
Lawoodry@peoplepc.com

August 7, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

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I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Laura A. Woodry

Laura A. Woodry

Dear Superintendent O'Neill

August 7, 2000

g: o'Neill

Golden Gate National Recreation Area is a beloved
:asure to San Franciscans and visitors alike. The Fort Funston portion of
Golden Gate encompasses 230 acres, including one of the best continuous exposures of a sandstone formation, revealing the last 2 million years of California geologic history, and the largest remnant of the San Francisco sand dune complex, of which only 5% still exists. The sandstone bluffs and dunes host a rare colony of bank swallows (listed as threatened in California), California quail, and burrowing owls. But destructive and excessive human activity threatens these park resources. Cliff-climbing, graffiti carved into sandstone bluffs, and, most particularly, free-running dogs threaten wildlife and cliff/dune stability. In fact, Golden Gate is the only unit of the entire National Park System that has tolerated off-leash dog walking. We are very concerned about the bank swallow colony and other native plants, wildlife and geologic formations in the Fort Funston area. We strongly support closures of sensitive areas to uses that threaten park resources. We oppose free-running dogs on Fort Funston's bluffs and dunes.
Golden Gate is not exempt from existing system-wide NPS laws requiring dogs to be on leashes.

Please help preserve the park for us and future generations.

Thank you
Mr. and Mrs. J.L. Denison
6931 E. 11th St.
Long Beach, CA 90815

FOFUAR01489

Monday, August 07, 2000 America Online: LAnnD4animals Page: 1

GGNRA007664

cy: O'Neill

RECEIVED
AUG 10 2000

5605 Vantage Point Road
Columbia, MD 21044

August 7, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

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I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Bruce Blum

cy: O'Neill

ZRS Zoological Research Service

Serving the Archaeological, Biological and Paleontological Sciences

August 7, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay and Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill,

We are writing to add our support to those individuals and organizations urging you to prohibit free-running dogs in the Fort Funston area of Golden Gate National Recreation Area. It is our understanding that this area includes a rare colony of bank swallows, as well as habitat for the California quail and burrowing owls.

We support closure of such sensitive areas to any human activities that endanger the habitat or its wildlife. There should be sufficient alternative beach areas for people to exercise their dogs.

Thank you for your consideration of this request.

Sincerely,

John McArdle, Ph.D.
Director

JM:kl

FOFUAR01491

14280 Golf View Drive Eden Prairie, MN 55346-3000
(612) 949-2603 FAX: (612) 949-2619

cy: O'Neill

Lise Brenner
558 Henry Street
Brooklyn, NY 11231

August 7, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123
Fax: 415-561-4710

Dear Superintendent O'Neill:

I live in New York, but I was born in San Francisco and raised in Seattle. I visit the west coast frequently and have many friends and family there. I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

g: O'hill

FERN E. RILEY
1683 Lisbon Lane
El Cajon, California 92019-4350
E-mail: msmriley@aol.com

August 7, 2000

Brian O'Neill, Superintendent
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

We are writing in support of measures to protect the Fort Funston portion of Golden Gate National Recreation Area. As you know, only five percent of this unique sand dune landscape remains.

We cannot understand why the National Park Service has failed to halt threats to fragile native vegetation and endangered bank swallows and to California quail and burrowing owls. For example, we urge you to act to enforce the NPS's own clear regulations regarding free-running dogs. Banning unleashed dogs at Fort Funston is an action that would go a long way in protecting sensitive areas of the sandstone bluff and dune system.

Thank you for your attention to our concerns. Please keep us informed on steps that the National Park Service will take to protect this area that we long-term residents and natives of this once beautiful state have always treasured.

Sincerely,

Fern Riley

Fern Riley (for the entire Riley family)

cy: O'Neill

RECEIVED
AUG 0 9 2000
SUPERINTENDENT'S OFFICE

Name: Patricia Curran
Address: 487 Lindley St
SF CA. 94131
Date: 8-6-00

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Patricia Curran

ag: O'Neill

Name: Alexandra Feit
Address: 2524 19th St.
S.F., CA 94110

Date: Aug 6, 2000

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

There are many miles of park service land NOT available to dog walking, so I am surprised at the supposed need to limit Fort Funston's dog area.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Alexandra Feit

ZANE GRIMM
ELAINE GRIMM
1924 GREAT HWY
SAN FRANCISCO CA 94116-1053

RECEIVED
AUG 08 2000
SUPERINTENDENT'S OFFICE

cy: O'Neill

Brian O'Neill, Superintendent
Golden Gate National Rrecreation Area
Building 201 Fort Mason
San Francisco, CA 94123

Re: Fort Funston (GGNRA) closure

94123+1300

FOFUAR01496

Aug. 6, 2002

Dear Superintendent O'Neill,

Please Keep Fort Funston an off-leash area in accordance with the 1979 Pet Policy reached by intervention of our two Washington Senators. You assured all parties there would be no change in the 1979 Pet Policy.

All groups should work together so that everyone can use this recreation area.

Zane + Elaine Grimm

FOFUAR01497

GGNRA007672

cy: O'Neill

August 6, 2000

Dear Mr. O'Neill:

I STRONGLY object to the recent closures and proposed NEW closures at Fort Funston. The fences keep tax paying citizens from enjoying what is the most scenic area of the Fort. In fact, the fences HAVE NOT benefitted the bank swallow population. The further proposed changes should be near the cliff face above the burrows. This would address public safety as well as the bank swallows while allowing those of us that use the Fort on a regular basis, we the predominant users of Fort Funston, we the organization that takes very good care of the area by supplying litter bags and conducting monthly cleanups, the continued access we desire and deserve.

Thank you for listening.

Sup. Brian O'Neill
Golden Gate Nat'l. Rec. Area
Bay & Franklin Streets
Building 201, Ft. Mason
San Francisco, CA 94123

94123-1058

FOFUAR01499

cy: O'Neill

1924 Great Highway
San Francisco, CA 94116
August 6, 2000

Willie Brown, Mayor of San Francisco
City Hall, Room 200
1 Dr. Carlton B. Goodlett Place
San Francisco, CA 94102-4639

Dear Mayor Brown:

This Letter is in response to Golden Gate National Recreation Area's newest proposal regarding off-leash areas at Fort Funston. It does not surprise me that the National Park Service (GGNRA) talks out of both sides of their mouth.

I have had extensive dealings in the past with GGNRA. Our group, the Sunset Coalition, was actively working with them. As it turns out, GGNRA never followed through on what they said they would do. It was our group who furnished the GGNRA with the history of the beach. They did not research the beach profile, as they would have realized that the beach moved inland going south.

Also, there was concern in 1981 about the snowy plover because of the sand replenishment program. The snowy plover survived but the sand replenishment did not. All the sand placed on the beach that was taken from the construction of the "super sewer" washed away during winter storms. GGNRA does not learn from past mistakes because they plan to do sand replenishment at Sloat Blvd where erosion is taking place even threatening the super sewer.

The 1979 Pet Policy sanctioned the continuation of off-leash activity at Crissy Fields, Fort Funston, and Ocean Beach. But GGNRA, ignoring the 1979 Pet Policy, made Ocean Beach an on-leash area. In order to get permission to place sand on the beach, GGNRA made deals with other agencies who wanted Ocean Beach to became an on-leash area.

San Francisco needs places that allow off-leash recreation for owners and their pets. Let us continue to be the city that knows how and a city that takes care of all their citizens.

Sincerely,

Elaine Grimm

ELAINE GRIMM

CC: Honorable Dianne Feinstein
Honorable Barbara Boxer
Honorable Nancy Pelosi
Honorable Tom Lantos
San Francisco Board of Supervisors
Superintendent Brian O'Neill
Linda McKay (Fort Funston Dog Walkers Assn)

cy: O'Neill

Mary C. Nicholson

RECEIVED

AUG 10 2000

g: O'Neill

51 Blackstone Road R.D. 2
North Adams, Ma 01247-9400
August 6, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5% of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I also cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed digs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps taken by the National Park Service to protect the Fort Funston site.

Sincerely,

Judith E. Embry

Judith E. Embry

FOFUAR01502

GGNRA007677

g. O'Neill

Joseph N. Samek
50 Winship Ave
Pittsfield MA 01201
August 6, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets
Building 201, Fort Mason
San Francisco, Ca 94123

Dear Mr. O'Neill:

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Thank you for listening.

Sincerely,

Joseph N. Samek

Park-Hotel Haarlass · Heidelberg
Konditorei – Café
Aussichtspunkt am Neckar und Bergwald

OAKLAND CA 946 PM 5 AUG 2000

CY: O'Neill

Virginia Apgar Physician 1909 1974 USA 20

Please protect the Fort Funston area of GGNRA and its sandstone bluffs and sand dunes by halting the running of unleased dogs in that area. Thank you. Protect the swallows, quail & burrowing owls.

Supt Brian O'Neill
Golden Gate NRA
Bay & Franklin St.
~~Bldg 201~~
Fort Mason
San Francisco CA
94123

Foto F. Michelmann C.P.F.6

FOFUAR01504

GGNRA007679

cy: O'Neill

08/05/2000

SWALLOWS, QUAIL AND OWLS

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123
Fax: 415-561-4710

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service are charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

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Sincerely,

Mr. Bobbie Dee Flowers
418 West 17th Street, Apt #22A
New York, NY 10011-5826
Phone: 212/242-0319
Fax: 775/743-5080
Email: bflowers@liu.edu

cy: O'Neill

Name: JON SINDELL
Address: 2475 46TH AVE.
S.F. 94116
Date: Aug. 5, 2000

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I have two children and a beautifully behaved boxer dog. Preserving open space for my kids and dog to romp and play seems to me a much higher priority than additional space for the bank swallow.

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

JON SINDELL

cy: O'Neill

August 5, 2000

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Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park
Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. GGNRA appears to be the only unit of the National Park System that openly ignores 36 CFR 2.1, allowing pet owners to run their dogs on fragile dunes. Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Omar Siddique
4517 Rebecca Court
Ellicott City, MD 21043
Omar@umbc.edu

cy: O'Neill

1850 Los Altos Drive
San Mateo, CA 94402

Phone (650) 349-0114
E-mail Powerscalif@cs.com

August 05, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay and Franklin Street
Building 201, Fort Mason
San Francisco, CA 94123

RE: Fort Funston

Dear Superintendent O'Neill:

As a member of both the GGNRA and the Fort Funston Dog Walkers we are puzzled as to why these two fine organizations are at odds with one another. Our goals - the enjoyment for all of the pleasures of Fort Funston - are certainly similar and no one would disagree with the protection of the bank swallow habitat.

We do, however, feel that the GGNRA has over reacted by now proposing to permanently close 12 acres. The fences should be located closer to the cliff faces. The Sunset Trail should be clear of drifting sand so as to make it accessible to all.

Fort Funston is a jewel appealing to everyone. Please let everyone enjoy it!

Sincerely,

Jim and Rita Powers

Jim and Rita Powers

FOFUAR01508

Cy: O'Neill

Name: Kyle Thornton
Address: 851 Alvarado St
SF CA 94114

Date: 8-5-00

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Kyle R Thornton

RECEIVED

AUG 10 2000

SUPERINTENDENT'S OFFICE

gj: O'Neill

2684 Thornbrook Rd.
Ellicott City, MD 21042
August 5, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. As you know, this area includes one of the best continuous exposures of a sandstone formation and the largest remnant of the San Francisco sand dune complex. The sandstone bluffs and dunes are home to rare colony of bank swallows, California quail, and burrowing owls. However these resources are threatened by excessive human activity. Cliff-climbing, graffiti sprayed on sandstone bluffs, and, most particularly, free-running dogs threaten wildlife and dune stability.

That is why I support closures of sensitive areas of Golden Gate National Recreation Area to uses that threaten park resources. Also, I oppose free-running dogs on Fort Funston's bluffs and dunes. Thank you for your time.

Sincerely,

Cathy Kunkel

Cathy Kunkel

ag: O'Neill

GAIL C. HERATH-VEIBY

August 5, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I can not understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California).

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,
Gail C. Herath-Veiby

cy: O'Neill

August 5, 2000

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123
Fax: 415-561-4710

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,

Susan Francis
3982 Eastrise Drive
Groveport, Ohio 43125
614/834-5902

FOFUAR01512

Sheen
cy: O'Neill
Sandy

Author: "saderhold" <saderhold@netzero.net> at np--internet
Date: 8/5/00 9:22 AM
Normal

TO: Brian O'Neill at NP-GOGASubject: Fort Funston---------- Message Contents

Superintendent Brian O'Neill
Golden Gate National Recreation Area
Bay & Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintendent O'Neill:

I am writing to support measures to protect the Fort Funston area of Golden Gate National Recreation Area. I do not need to tell you of the unique nature of the sandstone bluffs and sand dunes of Fort Funston. Only 5 percent of the San Francisco dune complex remains, and the National Park Service is charged with protecting those dunes within GGNRA "unimpaired for the enjoyment of future generations." Unimpaired does not mean resources scarred with graffiti or eroded by tracks and trails.

I cannot understand why the National Park Service has failed to enforce its own clear regulations at Fort Funston regarding free-running dogs. Is GGNRA the only unit of the National Park System that openly ignores 36 CFR 2.1, apparently encouraging pet owners to run their dogs on fragile dunes? Why have you not halted the threats to fragile native vegetation, bank swallows (listed as threatened in California), California quail and burrowing owls?

I urge you to end the habit of owners running unleashed dogs at Fort Funston and to protect sensitive areas of the sandstone bluff and dune system. Please keep me informed on steps the National Park Service will take to the Fort Funston site.

Sincerely,
Steven Aderhold
PO Box 1135
Fallbrook,Ca. 92088-1135

cy O'Neill

Name: Kathy Setian
Address: 1783 Sanchez St.
SF CA 94131

Date: Aug 5, 2000

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

Kathy Setian

cy: O'Neill

August 4, 2000

HANCOCK
ROTHERT &
BUNSHOFT
LLP
ATTORNEYS

Brian O'Neill
General Superintendent
Golden Gate National Recreation Area
Fort Mason, Bldg. 201
San Francisco, California 94123

Re: Fort Funston Closures

Dear Mr. O'Neill:

I am writing this letter on behalf of the San Francisco Society for Prevention of Cruelty to Animals ("SPCA") to address issues regarding Golden Gate National Recreation Area's ("GGNRA") notice received on Monday by the SPCA of notice and comment for federal rule-making of the "Proposed Habitat Protection Closure" at Fort Funston. We saw a similar notice posted at Fort Funston, advising that there was a "Document for Public Review and Comment" ("Document") at the Sunset Library, Fort Funston Visitor's Center, and the National Park Service ("NPS") Information Center downtown. This letter addresses concerns regarding inadequate public notice and procedural defects in the rule-making process described in the Document.

As indicated by the Document, this process was initiated because the "Federal District Court ordered preliminary injunction against the NPS, disallowing the closure until such time as appropriate public notice and opportunity for comment was provided." Yet a quick review of the proposal reveals the closure is substantially different from the one that resulted in the preliminary injunction in the lawsuit, *Ft. Funston Dog Walkers v. Babbitt, No. C 00-00877 N.D. Cal.* The new proposal extends the four and a half acre permanent closure to twelve acres taking even more recreational parkland, banning public access to all bluff views of the beach for the entire northern sector of Fort Funston. Despite drastic changes in the project only sixty days have been allotted for public comment. Moreover, people are told to file comments "as early as possible" if they want to be heard: "Public comments should be submitted to NPS as early as possible in order to assure their maximum consideration." The statement indicates NPS is not committed to providing an opportunity for meaningful public review, rather the rule-making process is merely a procedural hurdle before proceeding with the project.

[SFDOC:800-380-423025]

LOS ANGELES LAKE TAHOE SAN FRANCISCO LONDON www.hrblaw.com
4 EMBARCADERO CENTER
SAN FRANCISCO, CA 94111
TELEPHONE 415.981.5550
FACSIMILE 415.955.2599

Ultimately the court will decide whether there was "appropriate notice and opportunity for comment." This letter addresses serious problems with the rule-making process that could result in court reversal if not corrected. Public notice is inadequate, there is no provision for public review of the documents relied on for the proposal, and access has been denied to the area in controversy.

1. Effective Notice of the Proposed Closure

Although the sixty day comment period ran from publication in the federal register, GGNRA delayed posting notice of the proposed closure at Fort Funston for almost two weeks. As a general rule of land use practice, "appropriate notice" for public urban parks requires that signs be posted at the site where the proposed changes will occur. In contrast to other national parks, GGNRA has **unique** provisions in the enabling statute that require NPS to follow "principles of land use planning." In particular, the statute mandates: "In management of the recreation area, the Secretary of Interior ...**shall** utilize the resources in a manner which will provide for recreation and educational opportunities **consistent with sound principles of land use planning and management**." 16 USC, section 460bb. The "statement of purpose" further provides that the park was established "to provide for the maintenance of needed recreational open space **necessary to urban environment and planning**". Due process rights impacted by land use planning and development in an urban environment require that notice be posted at the site. The U.S. Supreme Court has defined adequate notice for due process to require: "notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Central Hanover Bank & Trust Co.* 339 U.S. 306, 314 (1950); *See, also Harris v. County of Riverside* 904 F.2d 497, 503 (9th Cir. 1989).

Second, no effort has been made to advise occasional users that their access to the entire northern bluffs in the park will be affected by this proposal. GGNRA estimates 750,000 "visitors enjoy Fort Funston annually," virtually the entire population of San Francisco (pg. 6). Extensive media coverage followed the original closure in March, yet GGNRA has done nothing to advise the general public of the latest development in the case. Typically in cases that affect the general public, notice is published in newspapers of general circulation. "The means employed must be such as one desirous of actually informing the absentee might reasonably adopt." *Mullane* 339 U.S. at 315. Clearly the intent is to limit public input, not facilitate it.

Further evidence of this intent occurs in the notice posted at Fort Funston. Only two signs were observed, one located on the backside of the bulletin board at the head of the Sunset Trail, hidden from public view, and the other at the bulletin board near the beach access trail, adjacent to a sign on the fence indicating "seasonal closure". In small print, the signs advise people that a document is available for review and comment at three locations and that comments are due by September 18th. No reference is made to the August 29th hearing of the Citizens Advisory Commission where comments can be made. Nothing is said about the expansion of the proposed habitat. Public confusion stifles dissent, since people tend to accept the fences as a fiat accompli, unaware that they will be moved to enclose more space if the

project is approved. Again, " notice must be of such a nature as reasonably to convey the required information." *Mullane* 339 U.S. at 314.

2. Public Access to Documents

The Document is silent on public inspection of the documents relied on for the closure. Three pages of reference material is cited at the end of the report, including "personal communications" with twelve individuals. Without access to this information, the public can't provide meaningful comment. Please make these documents available for public review during the comment period and advise the public where they can reviewed. With respect to the "personal communications" please provide access to minutes, tape recordings, summaries, raw notes, and any other memorialization of the communications. In addition, please provide the dates of the communications, who was present, what was discussed, conclusions reached, and the basis for those conclusions. We also ask you to extend the deadline for comment until these defects are cured.

3. Public Access to Areas Closed in March, 2,000

Since March public access has been denied to the entire fenced off area. After the bank swallows leave this month, the court ordered injunction requires NPS to open gates to the seasonal closure and provide access to the beach near the nesting sites. We ask you to include the Sand Spur Trail and the beach access trail adjacent to the 1995 closure, pending final determination of the new proposal. Public access to these areas were wrongfully denied during the original closure and inspection of the area is necessary to provide meaningful evaluation of the project.

4. Status of Battery Davis Closure and Other Designated Native Plant Areas

The justification for the "Proposed Habitat Protection Closure" does not address the status of other so-called native plant closures and projects at Fort Funston. Under various pretexts, GGNRA has removed recreational land from public use in several areas of the park in violation of its statutory mandate and NPS regulations requiring comprehensive park planning and development pursuant to public review.

In addition to the ten acre closure that resulted in the lawsuit, the following areas have had a substantial impact on recreational access to the park. Under the pretext of erosion control, nine acres adjacent to Battery Davis was fenced off in 1995, a temporary five year closure for native plant restoration which is still closed. The entire coastal bluff area below the hang glider platform was closed in 1998 for native plant revegetation. Last year, safety was used to rationalize the destruction of a paved "disability trail" and closure of several acres along the Sunset Trail adjacent to the former Battery Davis

closure.[1] Documents from 1992 and 1996 show various proposals to convert that area to a native plant habitat. Recently other native plant projects have been initiated, one near the paved road leading down to Lake Merced, another in front of the Fort Funston Visitor Center. These projects destroy "exotic" trees, bushes, and ice plants and result in further reduction of recreational access to parkland.

All projects were initiated without public review in violation of the statutory mandate requiring land use planning.[2] Even more significant, NPS regulations mandate "management plans" for the destruction of exotic plants with "provisions for public review and comment". (Management Policies Biological Resources Section 4:12-13; Natural Resources Management Guidelines NPS- 77, pg. 289.) These regulations were promulgated to deal with a typical national park where an invasive exotic species is impacting a native plant ecology. Just the opposite situation exists at Fort Funston, NPS is destroying an exotic plant ecology and developing a native plant ecology. Public input is mandated where development plans destroy park resources. Consider also that over twenty per cent of Funston has been closed to recreational access in areas where this activity is most concentrated without coordinated park planning, environmental impact analysis, or public input. Instead of addressing a situation that is clearly out of control, NPS embarks on federal rule-making limited to a very controversial parcel of land without adequate notice or an opportunity to develop meaningful public input.

Finally, retaliatory actions in response to the lawsuit have been initiated by GGNRA in the last few weeks. Our client has asked us to evaluate the removal of voice control signs at Fort Funston and Crissy Field.

Sincerely yours.

HANCOCK ROTHERT AND BUNSHOFT, LLP

Kenneth D. Ayers

cc: Edwin J. Sayres, President, The San Francisco SPCA

---

[1] Without public review or prior notice, GGNRA sent a bulldozer out to Funston in December, 1999 and began ripping up a substantial section of the only "disability trail" at Funston. NPS Management Policies on Accessibility for Disabled Persons require NPS to make "every reasonable effort ..to make facilities ...accessible to and usable ..for the disabled... The determination of what is reasonable will be made after consultation with disabled persons or their representatives." NPS Management Policies, Visitor Use Section, pg. 4; 43 CFR 17

[2] After the lawsuit was filed, the Sunset Trail area was reopened to the public and native plant habitat signs were removed from Battery Davis fences and the south coastal bluffs.

cy. O'Neill

August 4. 2000

Superintendent
GGNRA Bay and Franklin Streets
Building 201, Fort Mason
San Francisco California 94123

This letter is in regard to the notice of the proposed year-round closure at Fort Funston.

It is a known fact that having the companionship of a canine is beneficial to seniors.

I am 78 years of age, born in San Francisco and I have a dog. The problem is you are proposing to restrict the place I take my walk while having my dog go off leash. I thought when San Francisco gave GGNRA the land, it was with the understanding that traditional usage would continue. What happened to that promise?

Also why do you blame the declining bird population on dogs? I would think hang gliders would constitute a threat.

I urge you to reconsider your proposal to close Fort Funston to our best friends.

Ralph Selleck

Ralph Selleck
1587-45th Avenue
San Francisco 94122

Ralph Selleck
1587 45th Ave.
San Francisco, CA 94122-2936

Superintendent
GGNRA Bay and Franklin Streets
Building 201, Fort Mason
San Francisco California 94123

94123/9999

STATE OF CALIFORNIA -- THE RESOURCES AGENCY GRAY DAVIS, Governor

CALIFORNIA COASTAL COMMISSION
45 FREMONT STREET, SUITE 2000
SAN FRANCISCO, CA 94105-2219
VOICE AND TDD (415) 904-5200

S. Sheen
Cy: B. O'Neill
M. Scott

August 3, 2000

Brian O'Neill
Superintendent
Golden Gate National Recreation Area
Bay and Franklin Streets, Building 201, Fort Mason
San Francisco, CA 94123

Re: Federal Register Notice on proposed year-round closure at Fort Funston

Dear Mr. O'Neill:

Thank you for the opportunity to comment on the above-referenced Federal Register notice. In that notice, the National Park Service proposes a year-round closure of approximately 12 acres of Fort Funston to off-trail recreation use by the public. The purpose of this letter is to inform the National Park Service that that activity may affect resources and uses of the coastal zone and may require a consistency determination pursuant to the requirements of the federal Coastal Zone Management Act (CZMA).[1] Specifically, the National Park Service's proposal would restrict recreation use of the Fort Funston area and may affect public access to the shoreline and public recreational use of the coastal zone. Therefore, the Commission staff believes that the proposed project triggers a requirement for a consistency determination pursuant to the CZMA[2] and its implementing regulations.[3]

A consistency determination is an evaluation of the proposed activity's effects on coastal resources or uses and its consistency with the mandatory enforceable policies of the California Coastal Management Program and includes the necessary information to support the federal agency's conclusion.[4] A consistency determination must be submitted to the Commission 90 days prior to final federal approval of the activity, unless the state and the federal agencies agree to an alternate schedule.[5] If the federal agency determines that this activity does not affect coastal uses or

[1] 16 USC § 1450 *et seq.*
[2] 16 USC § 1456(c)(1).
[3] 15 CFR § 930.34(a).
[4] See 15 CFR § 930.39 for a list of necessary data and information.
[5] 16 USC § 1456(c)(1) and 15 CFR §930.41(c).

resources, it must submit a negative determination 90 days before final federal approval of the activity.[6]

If you have any questions or need assistance preparing a consistency determination, please contact me at (415) 904-5292. Thank you for your cooperation in this matter.

Sincerely,

James R. Raives
Federal Consistency Coordinator

cc: North Central District

[6] 15 CFR § 930.35(d).

cy: O'Neill

RECEIVED
AUG 07 2000
SUPERINTENDENT'S OFFICE

Name: KATHRYN HASSIE
Address: 3610 QUINTARA AV
SAN FRANCISCO, CA
94116
Date: 8/3/2000

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

By far the majority of visitors to Fort Funston are San Franciscans and their dogs. They go to Fort Funston to enjoy its decades-long tradition of off-leash free play and canine socialization, in a windblown but gloriously beautiful section of San Francisco coastline.

In one of the most densely populated cities in the country, such space is vital to the 38% of us who keep dogs, love the land, and contribute to the maintenance of our local environment.

Sincerely,

PLEASE SAVE FORT FUNSTON

August 3, 2000

Superintendent
Golden Gate National Recreation Area
Bay & Franklin Streets
Building 201 Fort Mason
San Francisco, CA 94123

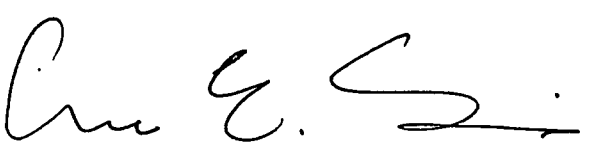
Dear Superintendent:

I am a Member of SF Dog. I'm sure I don't need to tell you how much the situation at Fort Funston has affected all the dogs and their devoted owners in the area. You've heard our voices. There are thousands of us "dog people" who have informally become friends and a community not unlike all the like-minded communities that comprise our great city. A major reason I moved to San Francisco 13 years ago was its well-known dog friendliness, especially at places like Fort Funston, truly a diamond in the rough.

There have always been places for me to safely let my dogs run free. Those places are dwindling. In Precita Park for instance, one couple nearby has evidently made anti-dog efforts their mission, and now I am forced to walk my dog at night at unlit Bernal Hill, which is extremely unsafe.

Speaking for the many responsible dog owners in this city, KEEP ALL OF FORT FUNSTON OPEN, and help us include our furry friends in the mix that is San Francisco. If you've read this far, thanks for listening.

Annie E. Sammis
81 Bradford Street
S.F., CA 94110
Ph. (h) 415.643.8871
Email (h) asammis@pacbell.net



Ms. Annie Sammis
[illegible] Bradford St.
San Francisco, CA 94110-5701

AIR MAIL

SAN FRANCISCO CA
PM
APR
2000

BREAST CANCER

USA First Class

Superintendent
Golden Gate Natl Rec. Area
Bay & Franklin Streets
Building 201 Fort Mason
S.F., CA 94123

FOFUAR01525
GGNRA007700

Name: KAT
Address: 361
SAN F
Date: 8/3/2C

Brian O'Neill
Superintendent
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I am writing to protest the closure of 12 acres of Fort Funston. Fort Funston was given to the National Park Service by San Francisco for recreational use, and in legislation creating the GGNRA, Congress specified urban recreation as a priority.

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Sincerely,

PLEASE SAVE FORT FUNSTON

FOFUAR01526

GGNRA007701

cc: O'Neill

Aug 2, 2000

Brian O'Neill, Supt.
GGNRA

Delphia P. Scully
408 Melrose Avenue
San Francisco, CA 94127

I urge you to keep off-leash/voice control dog walking as one of the recreational activities at H. Fenston. At the rate the NPS/GGNRA is acting re: restricting/selecting recreational activities at H. Fenston, dog owners, a.k.a. taxpayers and "treated" will be driven out of the area and become an unprotected "endangered species."

Multi-use recreational spaces in the Bay Area are rapidly diminishing due to population pressures and specialized "interest" organizations competing for the same ea, even if their purposes/missions are diametrically opposed to each other. We must share! Do not depend us individual dog owners/walkers) of our share. As a minority, we ~~as~~ need protection from other specialized encroachments.

As an individual dog owner/walker, who has always enjoyed the open space of H. Fenston for 20+ years, and the policy of off-leash/voice control for my dog, I do believe in sharing, plus common courtesy. Surely, the NPS/GGNRA can administer this area with the same

(cont)

concepts of sharing re: offleash/voice control dog walking as a recreational activity.

Sincerely,
Delphia P. Scully

Delphia P. Scully
408 Melrose Avenue
San Francisco, CA 94127

P.S. I'm also a dues paying member of GGNPOA

cy: O'Neill

August 1, 2000

Mr. Brian O'Neill, Superintendent
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201, Fort Mason
San Francisco, CA 94123

Dear Mr. O'Neill,

As a fourth generation San Franciscan, Fort Funston has always had a special place in my heart. Over the years I have spent many hours walking my dogs in the park. The proposed closure of yet more acreage at Fort Funston forces me to write this letter and express my outrage.

The stated reasons for the closure is the need to protect the bank swallow and the restoration of native plants. Without facts to support this closure and without comments and presentations by all parties effected, the proceedings will be a sham. Therefore, it is imperative that the Fort Funston Dog Walkers be able to participate in the proceedings.

The Audubon Society and the Native Plant Society are very large, political organizations that have a lot of power in the country. A small local grassroots organization like the Fort Funston Dog Walkers is not only dwarfed in the number of members, but also political clout and financing. But, that should not give them more of a say in what happens in our community.

Please consider the views and comments of all users of the park to come up with creative solutions to address these concerns.

Best regards,

Michael Casassa

cy: O'Neill

August 1, 2000

Superintendent
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201 Fort Mason
San Francisco, CA 94123

Dear Sir,

I am most alarmed to learn of the latest closures proposed at Fort Funston. There seems to be no scientific rationale for the closure. Instead, it seems to be a land grab to turn a former military base (hardly a pristine wilderness) into a nature exhibit.

I am an environmentalist and animal lover, and would never want to harm wildlife. Furthermore, I am a native plant fan, and my yard has been landscaped with native plants. But it doesn't make sense to take a fantastic piece of recreational area out of use in a dense urban area with the dubious goal to restore it to "natural" condition. What's the next step -- "restore" all of the GGNRA to its original windswept sand dunes? The Presidio was nothing but sand dunes and a little scrub brush before some misguided person decided to plant trees there. Do you propose to pull out all the trees to restore it to its natural condition? It's the Golden Gate National **Recreation Area**, not the Golden Gate National Wilderness Park!

Off-leash dogwalking has been an acceptable recreational activity at Fort Funston for almost 40 years. Congress recognized dogwalking as a recreational activity in its enabling legislation when GGNRA was established. In conformity with this, GGNRA similarly has recognized off-leash dog walking as an acceptable recreational activity

The idea that people and dogs strolling along the cliffside walk threatens the bank swallows is absurd. Many dogwalkers have observed the swallows peacefully coexisting with the dogs--actually following them around in the ice plant, eating the insects that are disturbed by them (scientists say that bank swallows eat all kinds of insects). The major threat to bank swallows, as determined by the California Department of Fish & Game, is flood control and bank protection projects near farmland in the Central Valley.

I am a regular user of Fort Funston, along with my two dogs, and have been going there several times a week for the past three years. Here are some of the things I have observed, and NOT observed:

* I have never seen dogs chase or harass wildlife at Fort Funston (in fact, I have observed a rabbit living unharmed near one of the main trails for months on end)
* I have never seen any dogfights or dog aggression that threatened any dogs or people using the park

* I have seen hundreds of people and dogs using the park on countless different days, but never have witnessed a person or dog go off the cliff edge (if you want to prevent this, simply put up fences at the cliff edge, in front of the path--nobody could possibly object to this)
* The vast majority of Fort Funston visitors are with dogs--thus the argument that off-leash dogwalking serves only a small group of park visitors is spurious
* There is remarkably little incidence of dog litter, considering the hundreds, if not thousands, of dog visits every day--most of the dog people are conscientious
* Day after day, hundreds of people enjoy the wonderful views and fresh air and the beauties of our area, while exercising their dogs (by definition, responsible dog-owners!). The heavy usage by dog people guarantees a safe environment (parks that ban dogs have more crime) and encourages community development--the informal contacts that develop here go a long way towards counteracting urban stress and alienation.

I urge you to desist from this misguided plan and return Fort Funston to its long-time use as open space, for the enjoyment of all. It's worth noting that 25% of the residents of San Francisco have dogs--we pay plenty of taxes, yet receive second-class treatment in access to public facilities.

Sincerely,

Anne Ryder
5705 Diamond Heights Blvd
San Francisco, CA 94131

cc: Fort Funston Dog Walkers
San Francisco Dog Owners Group

Mayor Willie Brown
Senator Barbara Boxer
Senator Dianne Feinstein
Rep. Nancy Pelosi
Rep. Tom Lantos
Supervisor Mabel Teng
Supervisor Mark Leno
Supervisor Gavin Newsom
Supervisor Leland Yee

S. Sheen
cy: O'Neill

August 1, 2000

Mr. Brian O'Neill, Superintendent
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201, Fort Mason
San Francisco, CA 94123

Dear Mr. O'Neill,

As a daily visitor to Fort Funston, I am dismayed that you are again attempting to close off more of the park to public access.

Since I retired from full-time employment five years ago, Fort Funston has become a very important part of my life. Fort Funston provides a wonderful place for me to exercise myself and my dogs that cannot be achieved at city parks. I have made many friends on my daily walks, many elderly who come to Fort Funston because they know it's a safe place for them to walk.

The reasons you state for the closure is the need to protect the bank swallow and the restoration of native plants. This closure must be supported by facts, not because of pressure for the omnipotent Audubon Society and Native Plant Society. Comments and presentations from the Fort Funston Dog Walkers must be considered, because without input from all users of the park the entire process will be a sham.

There has been no disagreement that the bank swallow's nesting area needs to be protected. But, the vast acreage you have already closed off and are proposing to add to, has not been proven necessary. Creative solutions need to be used to protect the cliffs. Dogs are not the enemy of the bank swallow as the Audubon Society claims. The birds are thriving all over the city from the Olympic Club to the new Pacific Bell Park.

As to the need for additional acreage for native plant restoration, currently 23 acres are already closed for such a purpose, not including the area west of the Battery Davis "Y" which for years has been closed for plant restoration and now appears to be closed for safety. This is a substantial portion of the usable acreage on the park already off limits to the public.

Please allow all groups effected by the proposed changes to express their views.

Best regards,

Cory Casassa

cy: O'Neill

July 31, 2000

Superintendent
Golden Gate National Recreation Area
Bay and Franklin Street
Building 201, Fort Mason
San Francisco, CA 94123

SUBJECT: Comment re Notice of Proposed Year-Round Closure at Ft. Funston

I'm a citizen who has visited Ft. Funston daily, rain or shine, for over 40 years. I have enjoyed many a sunset and have met hundreds of wonderful people who love the park as much as I. I have treasured its diverse plant and wildlife and agree that reasonable efforts must be made to preserve them.

The statutes and authorities cited in your Proposal apply to the management of ***national*** parks. Fort Funston is a ***recreational*** park.

The past closures, planned future closures, destruction of paved paths, removal of benches, and repeated attempts to impose dog leash requirements appears to violate the statutes creating GGNRA in 1972. At that time, legislation enabling the Federal government to take control of Ft. Funston (H.R. Rep. No. 1391, 92nd Cong., 2nd Session [1972]) stated that it be ceded to NPS with the understanding that it be preserved as an open ***recreational*** area. A 1975 Agreement between the City and County of San Francisco and the United States, and the deed transferring Fort Funston to the United States confirmed this.

Even the passage of the Organic Act did not change this — the Act itself, the rewritten regulations, and the courts all have made it ***very*** clear that the enabling legislation controls. Yes, all parks were to be treated similarly, but not in contravention of the enabling legislation.

NPS/GGNRA has not conducted environmental studies. It has not presented compelling scientific data to support the past and proposed closures and the necessity to restore native vegetation or create wildlife habitat. It offers numerous references in support of its Proposal, but I'm not convinced all individuals and studies referenced are applicable and/or impartial (see #1, below).

It is in NPS/GGNRA's best interests to explore more moderate approaches to accomplish the protection of the threatened bank swallows in order to avoid mutually costly confrontations such as this one.

> For example, has NPS/GGNRA done any study of why the population has declined so dramatically since efforts were begun to destroy the adjacent habitat?

Because Fort Funston is a ***recreational*** area, I do not agree that non-native plants and trees should be removed and replaced with "native" plants, especially when there is no evidence that

the plants being cultivated are "native." In addition, the enabling legislation requires maintaining the park in its natural setting, not creating something that was never there in the first place.

Regrettably, I must question the stated purposes and reasons given in the Proposal for permanently closing off even more areas of Fort Funston. NPS/GGNRA has destroyed its credibility with FFDW and other citizens who use its parks. NPS/GGNRA is perceived as having acted in bad faith

Although NPS/GGNRA has asked for public comment, past actions call into doubt its willingness to consider opinions that differ from its own. It seems resolved to move forward with a pre-conceived agenda, regardless of the reasonable number of reasonable arguments that are put forth in opposition.

Here's why I say that.

1. Having consulted with selected individuals and environmental groups like the California Native Plant Society and the Audubon Society, while conspiring to withhold information and deny input from others, NPS/GGNRA then moved with uncharacteristic speed, and without public review and comment, to close off more areas of Ft. Funston. (This was revealed through documentation produced by the government as part of the discovery process in FFDW's lawsuit against NPS/GGNRA.)

U. S. District Judge William Alsup found the hasty closures to be "highly controversial" and determined that there was " . . . an intent on the part of the NPS to railroad through the closure, to maintain secrecy, to unleash the fencing with lightening speed, and to establish a fait accompli."

Judge Alsup goes on to say at a hearing, "It sort of sounds like the Park Service is afraid to let the public have input," after saying that, "There was some evidence that would support the proposition that the officials in the Park Service recognized that the dog walkers would not be happy with the decision and wanted to run it through as quickly as possible. It sounds like as soon as the D-day boats are launched, they want them on the cliffs immediately so there won't be any time for opposition."

On May 16, Judge Alsup declared the hasty "emergency" closure of a large area of the Fort "a complete end-run around this lawsuit."

2. Citing safety concerns, the Sunset Trail, heavily used by tourists, disabled individuals, seniors, families with children, joggers, and bikers, as well as dog walkers, was summarily and without explanation or notice, ripped out. Benches were removed and one of the most scenic, best loved paths in the park was cordoned off and permanently closed. This, in spite of the fact that on December 3, 1999, Fort Funston Dog Walkers suggested that the safety issue could effectively be addressed by diverting a small section of the path.

The Sunset Trail has been re-opened, but NPS/GGNRA alleges that it cannot afford to re-pave it. Seniors, bikers, and disabled people can no longer use it. These individuals have had something precious taken from them.

3. It was FFDW's understanding that areas closed in 1995 for the purpose of native plant restoration (which never happened) were to be re-opened after five years. Under the mistaken impression that it had an agreement with NPS/GGNRA, FFDW did not pursue the matter further. Five years later, and the closed areas have not been re-opened, nor have native plants been restored. This duplicity represents a breach of trust, if not technically a lie, on the part of NPS/GGNRA.

4. In 1992, without public hearings, NPS/GGNRA attempted to rescind the 1979 Pet Policy. After a huge public outcry and intervention by then U. S. Senators John Seymour and Alan Cranston, assurances were made that the Pet Policy would be untouched.

5. In 1997, NPS/GGNRA revoked the dog policy from the 1996 Compendium. This was done in secret despite tremendous public outrage over previous closures. (This fact was only revealed through documentation produced by the government as part of the discovery process in the lawsuit.)

6. NPS/GGNRA has reneged upon written and spoken agreements it had with the San Francisco SPCA (July 13, 2000 letter from Edwin J. Sayres, President SPCA to Chris Powell, GGNRA) and San Francisco Animal Control concerning use of San Francisco recreational areas under its jurisdiction.

I'd also like to point out that the repercussions of the restrictions that have already been imposed, and additional closures that are proposed, on the use of GGNRA managed parks, will adversely impact the City of San Francisco and its citizens in a number of ways that I can think of; there are probably others:

<< Increased use of City parks and resulting dissension among individuals who have conflicting interests;

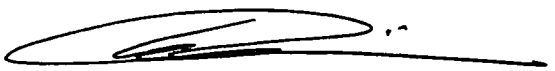
<< Higher incidences of dog behavior problems (excrement in parks and on public streets, stray dogs wandering the streets and parks, dog fights, bites, etc.);

<< Increased owner abandonment of dogs due to behavior problems associated with poor socialization and lack of exercise and higher numbers of dog euthanasia;

<< Need for higher staffing levels in Animal Control to cope with increased workload.

Officials of San Francisco will inevitably become more aware of this cause and effect and the City may have no choice but to *exercise its reversionary interest in Fort Funston.*

Legal expenses for FFDW and SFDog already total into the tens of thousands of dollars and are expected to run into tens of thousands more. Individuals of moderate means, like myself, are shouldering this burden. It's not right that it should be so costly for common people to protect their rights against the capriciousness and callousness of a small number of bureaucrats who can call upon the full weight and resources of the U. S. government.



Alberta Romanini
52 Northgate Avenue
Daly City, CA 94015

cy: O'Neill

July 26, 2000

Mr. Richard Bartke, Chair, GGNRA Advisory Committee
Ft. Mason, Building 201
San Francisco, CA 94123

Dear Mr. Bartke:

This letter concerns recent and proposed closures in the Fort Funston Recreational Park, located in San Francisco, CA.

In 1972, Congress passed legislation enabling the Federal government to take control of Ft. Funston on the condition that it be maintained as a recreational park. At that time, Mayor Brown spoke eloquently in support.

Esteemed board members, this is a case of a few individuals in a regional office of a Federal agency taking and proposing actions which circumvent the intent of Congress. ***Should these individuals be able to undo what it took legislative action to achieve?***

Since I last wrote, U. S. District Judge William Alsup supported our contention that NPS had acted in bad faith when it made extensive changes to the use and accessibility of the Fort Funston Recreational Park. As a result, NPS has been compelled to publish a notice of intended closures and ask for public comment.

Unfortunately, this concession was won at a considerable financial cost. San Francisco's citizens have had to go to Federal court to challenge NPS/GGNRA. Legal expenses already total into the tens of thousands of dollars and are expected to run into tens of thousands more before this struggle is over. Individuals of moderate means, like myself, are shouldering this burden. It's not right that it should be so costly for common people to protect their rights against the capriciousness and callousness of a few bureaucrats who can call upon the full weight and resources of the U. S. government.

The citizens of San Francisco, who rely on the Advisory Committee to act in their best interests, ask for your support. **Please** take a moment to read my letter to the Superintendent of GGNRA (enclosed) in response to its Notice of Proposed Year-Round Closure at Fort Funston. It sets forth some of our arguments and concerns in detail.

You will see that NPS/GGNRA has abused the public trust in this matter and that although NPS was forced to ask for public comment, its past actions call into doubt its willingness to consider opinions that differ from its own. And you will see that the repercussions of the restrictions that have already been imposed, and additional closures that are proposed, on the use of GGNRA

managed parks, will adversely impact the City of San Francisco and its citizens.

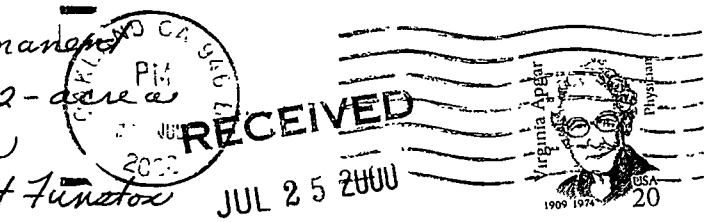
I am hopeful you will conclude that by adopting a more moderate approach to managing this **recreational** park, NPS/GGNRA can, with public review and input, achieve reasonable environmental goals and protect the threatened bank swallow without compromising the diverse interests of the park's users (i.e. hiking, biking, off-leash dog walking, sight-seeing, bird watching, etc.).

Sincerely,

ALBERTA ROMANINI
52 Northgate Avenue
Daly City, CA 94015

S. Sheen
cy: B. O'Neill
M. Scott
N. Walthall
Y. Ruan
T. Thomas

I support a permanent closure of the 12-acre area of the NW section of Fort Funston to protect the bank swallow habitat from dogs & people. We must protect the bank swallow colony & other animals, plants & formations. Thank you. Jean King



Superintendent
Golden Gate Nat. Rec Area
Bay & Franklin St
Bld 201
Fort Mason
San Francisco CA 94123

Jeanette King
4205 Colgate Way
Livermore, CA 94550-3414

FOFUAR01539

GGNRA007714

S. Sheen
cc: B. O'Neill
M. Scott
N. Walthall
Y. Ruan
T. Thomas

July 24, 2000

Superintendent
Golden Gate National Recreation Area
Bay and Franklin Streets
Building 201, Fort Mason
San Francisco, CA 94123

Dear Superintendent:

I am a voting member of the San Francisco population who is proud of her city, parks, citizens, and canine companion.

I am writing to tell you about my discomfort in the closures at Fort Funston for dog owners. This renowned park with exceptional access to the beach and sand dunes is a small slice of heaven for dog and people lovers in a city that shares it's diversity and warm with millions of people each year. My cocker spaniel, Toby, and I have shared this park at least three to four days a week for the past six years (after bringing Toby home from the SPCA). After working in Oakland all day, I hurry home so we can experience the utopia that belongs to all of us.

I have never met such gracious dog companions, not only do they keep the park up but they always seem willing to help out each other – which you know doesn't always happen in large urban areas. Toby is a great animal and people dog, many times we have stopped to share his love with children and the elderly who visit the park without animals. The joy they receive is a small fraction of what we receive from having this experience together.

To think that the harsh realities of life can be forgotten for a few minutes a day at this majestic setting is a blessing only San Francisco and the National Park Service can give. By continuing to limit space (lately changed from 10 to 12 acres), the National Park Service who represents all of the citizens is taking away inch by inch the few places left at which we can enjoy nature in an atmosphere of peace.

I do hope you will consider carefully the space issues brought to your attention by the Fort Funston Dog Walkers Association. The rumor at the park is that this is a first step to take away all off leash privileges. If the rumor is the National Park Service's real intention we are all in a great deal of trouble. What is the National Park Service for – if not for the privilege to be in a protected area with nature. Please don't lower your standards as what has occurred with the State Park System in their unfriendly attitude towards dogs.

Sincerely,

Nancy Collins

Nancy Collins
122 Clinton Park
San Francisco, CA 94103

MICHAEL JACOB
379 ELWOOD AVENUE
OAKLAND, CA 94610
510 444-2701

July 24, 2000

S. Shean
Cy: B. O'Neill
M. Scott
N. Walthall
Y. Ruan
T. Thomas

Superintendent
Golden Gate National Recreation Area
Bay and Franklin Streets, Building 201
Fort Mason
San Francisco, CA 94123

RE: Please do not close off more of Fort Funston

Please do not close off acreage at Fort Funston to people or dogs. Please remember that your charge is for a recreation area, not to return land to some unachievable pristine condition.

I believe that there is misguided movement in some places today that involves the attempt to launch struggles against human use in inappropriate places such as those few urban places where people and their dogs can enjoy the beauty and freedom of an off-leash walk.

The earth and the land need conserving and restoring; there is no question about that. However, it strikes a blow against sound environmental policies when you limit and punish city dwellers who have come to use and cherish tiny little pieces of beautiful land on the coast.

This does nothing but alienate people and create enemies of environmental efforts who would otherwise be friends. In cities, you would be better served to create and enhance beautiful areas that people and their dogs can use. They would then come to cherish your work and support you in the larger effort.

Respectfully,

Michael Jacob

Cy: S. Sheen, M. Scott

Author: GOGA WR Information at NP-GOGA
Date: 7/24/00 8:43 AM
Normal

TO: Brian O'NeillSubject: Fort Funston ---------- Message Contents

Brian - this was emailed to the PWR Information Office - the senders email address is rutkowski@terraworld.net.

craig glassner

---------- Forward Header ----------
Subject: Fort Funston
Author: "Robert E. Rutkowski" <rutkowski@terraworld.net> at np--internet
Date: 7/22/00 1:44 PM

Superintendent
Golden Gate National Recreation Area
Bay & Franklin Sts., Building 201
Fort Mason
San Francisco, CA 94123

Dear Superintent:

"...to promote and regulate the use of the...national parks ..which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for
the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." National Park Service Organic Act, 16 U.S.C.1.

The quote above from the act which established the National Park Service (NPS) in 1916 applies to every unit of the park system, whether it is designated park, monument, recreation area or seashore. This story regards an effort be the park service to uphold its mission, and the opposition it has garnered from a group of park users. Your help is needed to protect a threatened resource.

As you know, the controversy over management of the Fort Funston area in the Golden Gate National Recreation Area (GGNRA). Fort Funston's 230 acres include one of the best continuous exposures of a sandstone formation revealing the last 2 million years of California geologic history and the largest remnant of the San Francisco dune complex, of which only 5% still exists.

It is my understanding GGNRA over the past several years has engaged in numerous efforts to protect and restore the dune ecosystems (which face threats primarily from invasive exotic plant species and trampling from humans and animals) It is also working on plans to protect a colony of rare bank swallows. The migratory birds, as their name suggests, build nests in burrowed holes in suitable banks along rivers and beaches. There is a colony in the Fort Funston that is threatened by continuing erosion of the coastal bluffs they nest in. The Funston bank swallow colony is one of only two remaining on the California coast (most California bank swallows breed in the Sacramento River Valley and are declining there). They are a listed

threatened species under the California Endangered Species Act.

The park has studied both the causes of the erosion and ways to prevent it. Some of the most serious threats are activities such as off-leash dog running and cliff climbing. Others include graffiti-carving in the soft sandstone, fireworks set off on the beach below the bluffs, rescues of people and dogs trapped on the bluffs and overflights of hang-gliders. The number of visitors to Fort Funston has increased dramatically in the last five years.

On July 14, the NPS officially proposed in the Federal Register a permanent closure of a 12-acre area of the northwest section of Fort Funston to protect the bank swallow habitat, "enhance significant native plant communities, improve public safety and reduce human-induced impacts to the coastal bluffs an dunes, a significant geological feature." This official listing followed previous management efforts by the park which were opposed by an organized group of dog-walkers who sued. The judge sided with the dog-walkers, requiring the NPS to perform a full public process before protecting this resource.

I believe that this closure is essential to protecting the swallows and other valuable remnants of the habitats that once covered this area of the coast. In addition to the swallows, Fort Funston is one of only three sites in San Francisco where California quail still survive, along with burrowing owls, brush rabbits and other native wildlife.

I write in support of this proposal. I express concerns about preserving the bank swallow colony and other native plants, wildlife and geologic formations. I also suggest you question why dogs are allowed off-leash here, when off leash dog walking is forbidden by law on all NPS land.

Thank you for the opportunity to bring these remarks to your attention.

Yours sincerely,
Robert E. Rutkowski, Esq.

cc: Bob Stanton

2527 Faxon Court
Topeka, Kansas 66605-2086
Fax: 1 785 379-9671
E-mail: r_e_rutkowski@hotmail.com

RECEIVED
JUL 24 2000
SUPERINTENDENT'S OFFICE

B10'
S. Sheen
Cy: B. O'Neill
M. Scott

July 19, 2000

Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 201
Bay and Franklin Streets
San Francisco, CA 94131

RE: Proposed Closure of Twelve Acres of Fort Funston

To Whom It May Concern:

Several months ago I visited Fort Funston with my Yellow Labrador, Chance. I was shocked to find that a large portion of the park was fenced off. I have recently been told that the GGNRA proposes to take two more acres and further restrict access.

Chance and I do not live in San Francisco, however, we do come regularly to visit. Fort Funston and Ocean Beach are two of our favorite haunts. Living in Chico, Chance only gets to go surfing when we visit one of these two sites – something he and I both love to do.

It's my understanding that National Recreation Areas were created to provide a number of outdoor experiences for both residents and tourists. While I don't deny the importance of maintaining a natural environment, I don't understand why GGNRA officials consistently trample the rights of dog owners. Walking and playing with a dog are healthy and appropriate uses of recreation areas. Dogs play an important role in family life today and they need exercise as much as their human counterparts. Fort Funston and Ocean Beach have provided my dog and myself with exercise and entertainment for several years. I probably would not have visited either place if I didn't have a dog.

Please give the people, and their dogs, the twelve acres that are proposed for closure. There are very few places in San Francisco where dogs and people can play. Fort Funston is considered the Disneyland of the canine world. Can you imagine what it would feel like if Disneyland no longer allowed children to visit?

Thank you for considering my letter.

Sincerely.

Erin Brown

Erin Brown (and Chance)
1110 Arbutus Avenue
Chico, CA 94131

FOFUAR01544

cy: Scotts, Ruan, T. Thomas, Sharon Farrell, Roger Scott, N. Walthall, M. Aguilar

Author: Steven Pencall <spencall@gnww.net> at np--internet
Date: 7/19/00 10:36 AM
Normal

BCC: Brian O'Neill at NP-GOGATO: mssf@egroups.com at NP--INTERNETSubject: More on GGNRA c
osure---------- Message Contents

Hi Everyone:

These insightful comments on the proposed GGNRA closure were posted to another mailing list. I thought you might find them valuable as a window on to the way the NPS does business. I'm sure this will ring very familiar to many of you as the same kind of collusive and incestuous relationship exists between NPS and some of the groups opposing mushroom collecting, such as Sierra Club and Calif Native Plant Society.

"This (now official) closure is another legal battleground for public visitors
who have sued the National Park Service (NPS). The legal case may set a precedent and is worth reviewing."

"The current closure (of which this is an official announcement) of urban park
land was made without public comment. A number of park users, fitness runners and dog walkers as a recreation segment, claimed violation of public comment requirements (sound familiar). The NPS closed the area after consulting only the Audubon Society and their requests to enhance protection for the bank swallows (mere coincidence?)."

"The runners and walkers filed a lawsuit against the NPS for failure to follow
the requirements of open public disclosure and comment before making a land use change. An initial court order reopened the area to recreation use and censured the NPS for not following established procedure. The, very unhappy, local Audubon Society chartered a local San Francisco media campaign to sway public opinion in favor of more prohibitions on recreation use of the park."

"The last I looked into the situation, the case is still open and pending resolution. The Audubon Society is expected to leverage the media campaign to influence the official announcement and decision regarding closure (if you get caught stealing public property rights one way, try an alternate method of propaganda and purchase enough influence to achieve a selfish goal -- a dedicated exclusive bird watchers preserve)."

"A comment in favor of recreation access will make a statement that the public
does not approve of the GAG's stealing and swindling the public out of their property rights. The land may be public, in title, but without managed shared use the public is prohibited from exercising rights of ownership."

<sender signature snipped>

(SP comment) I guess no one will be surprised that there is nothing about the Federal Register notice or the comment period or anything else for that matter about the Fort Funston machinations on the GGNRA website:

http://www.nps.gov/goga/

Sunday, May 7, 2000 Home Edition
ID: 0000043099 Part A Section
Byline: JOHN M. GLIONNA
LA TIMES STAFF WRITER 569 words

'Don't Fence Us Out,' Dog Owners Say in Lawsuit Against U.S.

Courts: People who walk their pets accuse Park Service of closing off a San Francisco cliff site to protect swallows without sufficient public comment.

By JOHN M. GLIONNA, LA Times Staff Writer

For years, Ann Farrow and her poodle had taken their long afternoon walks inside Ft. Funston, the seaside San Francisco park with its breathtaking ocean views and well-trodden dog paths.

Not long ago, though, Farrow and other members of the area's tightknit dog-walking community were surprised to find that federal park officials had fenced off their favorite section of the 250-acre park without warning. The agency had made the move to protect the cliff-side nesting grounds of a migratory bird called the bank swallow.

"We were less offended with what they did [than by] how they did it," said Farrow, newsletter editor for the 650-member Ft. Funston Dog Walkers Assn. "The park disregarded us entirely, as if park users have no standing. The public be damned--that seems to be their motto."

So the dog walkers sued the Golden Gate National Recreation Area, contending that federal officials had ignored the process of seeking the necessary public comment for their project. The lawsuit also says the National Park Service might have broken the law by purposely keeping its plans under wraps.

The suit highlights the often competing interests at California parks such as 40-year-old Ft. Funston.

On one side are bird activists seeking to protect the bank swallows and park officials attempting to block wayward walkers from cliffs where the birds nest between April and August.

On the other side are the dog owners, with whom a federal judge recently sided.

U.S. District Judge William Alsup said that the Park Service violated its own rules when it put up the fence and that park officials should have solicited public comment before taking any action.

In a 30-page ruling--part of a legal battle that could still go to trial--Alsup said park officials misled pet owners, trying to keep secret their plan because they knew it would be controversial.

Evidence showed an intent on the part of park officials "to railroad through the closure, to maintain secrecy, to unleash the fencing with lightning speed and to establish a fait accompli," the judge said.

He ordered the area to be reopened in August after the swallows leave their nests in the park. But he stopped short of requiring park officials to seek public input before sealing the area when the swallows return next April.

Advocates for the birds say the judge's report protects the swallows--for now.

"This is a three-sided dispute," said Larry Silver, an attorney for the Golden Gate Audubon Society. "The Audubon Society wants to ensure the birds are protected, and the park wants to carry that out. The dog owners say they have a right to walk their dogs there."

Park Service officials declined to comment on the ongoing lawsuit.

In his April 26 decision, Alsup cited Park Service e-mails that included such comments as "We don't want this to blow up in our faces. . . . I want to keep the meeting with dog reps as small as possible. Otherwise we're asking for them to organize their constituency. Why should we provide a forum for them to beat us up?"

Silver said that although bird advocates can't condone the Park Service tactics, they support the idea of the new fences.

"If the Park Service violated public process, they did it because they didn't want to deal with the dog owners," he said. "The park officials just consider them to be impossible to deal with."

Dog owners say the area has been open to unleashed pets since 1961, when it was part of Ft. Mason, an Army installation.

"The Park Service has gotten arrogant over time, and they've forgotten who they serve," said Linda McKay, a dog owner who joined the lawsuit. "They've got this idiotic bunker mentality, where the people who use the park are perceived as the enemy. The lawsuit exposes them in a way they'd rather not be seen."

For now, Farrow said she and her poodle, Keli, will avoid the cliffs, which sit in San Francisco's southwest corner. But she said pet owners may yet emerge as top dog with a greater voice in how the park is used.

"What the park people did was sneaky and covert," she said. "And the judge is saying everyone has to follow the rules, even the government."

END Times story

(sender comment) "Interesting read, as it has all the elements we see everyday: limited public notification of a closure, the Audubon Society (working in the background with the National Park Service), and e-mails between the groups voicing concerns about the knowledge of improper influence and actions."

All the best,

Steven

N-161

JUN 2 6 2000

SUPERINTENDENT'S OFFICE

HABITAT RESTORATION SUPPORT GROUP
c/o Sandy Goldberg
5934 Taft Ave.
Oakland, CA 94618

June 20, 2000

Brian O'Neill, General Superintendent
Golden Gate National Recreation Area, Building 201
Fort Mason, San Francisco, Ca 94123

Bruce Babbitt, Secretary
Department of Interior
1849 C Street, N.W.
Washington, D.C. 20240

John Reynolds, Regional Director
National Park Service, Pacific West Region
600 Harrison Street, Suite 600
San Francisco, CA 94107

Robert Stanton, Director
National Park Service
1849 C Street, N.W.
Washington, D.C. 20240

Dear Gentlemen:

We request that the Golden Gate National Recreation Area (GGNRA) and the National Park Service (NPS) manage Fort Funston and GGNRA in compliance with 36 Code of Federal Regulations, Section 2.15(a)(2), which requires dogs to be on a leash in national parks and recreation areas. This regulation states:

> "The following are prohibited: ... (2) Failing to crate, cage, restrain on a leash which shall not exceed six feet in length, or otherwise physically confine a pet at all times."

The GGNRA and NPS recently, in documents filed in the U.S. District Court for the Northern District of CA, in *Fort Funston Dog Walkers v. Babbit* (Case No. C 00 877 WHA), stated that this regulation prohibits dogs off leash at Fort Funston. NPS regulations do not provide authorities the discretion to disregard the regulation for a particular location in a national park or recreation area.

While some of the undersigned are dog owners and understand the desire to provide areas where dogs can be walked off leash, national parks and national recreation areas are not the appropriate locations for this activity.

GGNRA has had a policy allowing dogs off leash and off trail at Fort Funston (see enclosed brochures) and other areas in GGNRA. Until recently, there were signs at Fort Funston indicating that dogs could be off leash, or as it is sometimes referred to, "under voice control." As a result of this well-publicized, long-term policy a situation now exists where hundreds of off leash dogs are found at Fort Funston.

This results in the following adverse impacts:

- It prevents natural growth of native vegetation and forces out native wildlife (such as California quail).
- Off leash, off trail dog walking has denuded slopes of all vegetation.

- The incredible diversity and beauty of the restored dunes, where dogs must be on a leash and stay on the trails, demonstrates the high habitat value of the rest of Fort Funston. It is expected that Fort Funston will be included in the recovery plan for the rare plant, San Francisco Lessingia. This further indicates that this is valuable habitat and off leash dogs should not be allowed to degrade it.

- The "voice control" policy simply does not work with the large number of dogs that visitors regularly bring to Fort Funston. Routinely, dogs are seen wandering without their owner anywhere in sight. Groups of dogs run and chase each other, ignoring voice commands by their owners. It is impossible to prevent dogs from running up to small children, who may be frightened. Numerous dog fights have occurred, and numerous people have been attacked or bitten by dogs.

- Frequently dogs run or are chased by other dogs over the steep coastal bluff and get trapped on the cliff. Park rangers lower themselves over the cliff to rescue the dog, risking serious injury. These risks are unreasonable and unnecessary.

- The extent of off leash dog use at Fort Funston degrades the experience of visitors who simply want a quiet, peaceful walk to appreciate nature.

GGNRA rangers routinely observe many dogs off leash, however they make no effort to inform people that they are required to put their dog on a leash or to enforce the leash requirement, except in limited areas closed for habitat restoration. This reflects an intentional policy of the GGNRA and NPS not to enforce the leash requirement found in NPS regulations, but rather to affirmatively allow hundreds of people to violate the federal regulations.

The GGNRA and NPS have the responsibility to take appropriate actions to educate visitors about the leash requirement and to enforce the regulation requiring that dogs must be on a leash. We request that the GGNRA and NPS immediately begin to do so.

As volunteers, we have each dedicated hundreds of hours working to restore and protect the GGNRA and we believe that it is equally important for the GGNRA and NPS to uphold their obligation to fully protect the Park resources. We are hopeful that the Park will do so. However, we also request that you consider this letter notice of our intent to file a legal action in federal court to require the GGNRA and NPS to manage the GGNRA and Fort Funston in compliance with 36 Code of Federal Regulations, Section 2.15(a)(2).

Thank you for your consideration of this matter.

Sincerely,

Sandy Goldberg

Sandy Goldberg, Chris Vulpe, Joy Durighello, Jaime Cabada, Ingrid Cabada, Adele Fasick, Virginia Krasevac, Marianna Pieck, Peggy Van Diem, Shirley Suhrer, Charlie Starbuck, Lucy Stofle-Anderson, James Dougherty, Dale Smith

Members, HABITAT RESTORATION SUPPORT GROUP

cc: Chuck O'Connor, U.S. Attorney's Office; Ralph Mihan, Field Solicitor, Dept. of Interior; GGNRA Advisory Commission

Golden Gate
National Park Service
U.S. Department of the Interior

ENJOYING THE PARK WITH YOUR DOG

DOING YOUR PART

There are many opportunities to enjoy Golden Gate National Recreation Area with your dog. It is important to remember that national parks contain resources that can be seriously damaged by dogs that are not properly controlled. Rules pertaining to dogs are designed to provide a safe and enjoyable experience for you and your dog, as well as other visitors, while also protecting park resources.

Your cooperation is necessary if this is to remain one of the premier national park sites in the country. Please be mindful of restrictions on off-leash dog use and observe the rules of common courtesy and dog etiquette. **You may be cited and fined for a violation of these rules. (36 CFR Part 2)**

Leash Length

In areas requiring leashes, dogs must be kept on a leash no longer than six feet.

Dog etiquette

Always pick up your dog's litter. It is unhealthy, contaminates the environment, and affects the territorial behavior of some wild animals. It is inconsiderate to leave your dog's litter in public areas.

Many children (and adults) are frightened by dogs. Hikers, bicyclists, and equestrians may also be disturbed, and even endangered, by dogs that are not effectively controlled. Please show respect for others by closely managing your dog. Barking and aggressive dogs are not appreciated in any park area.

Service dogs

A service dog is one that assists someone who has a vision or hearing impairment. If you have a service dog, please inquire at one of the park visitor centers for assistance in planning a hike.

What is "Voice Control"?

In some areas, dogs are permitted off-leash under "voice control." This means the dog must respond immediately and obediently to single commands. In a voice-control area, a dog owner must ...

— be familiar with the boundary of the voice-control area
— carry a leash at all times
— leash the dog immediately if it displays aggressive behavior toward any person or other animal or is not responding to commands
— assure the dog does not dig holes, chase wildlife, destroy vegetation, or enter any fenced or closed areas, or disturb other visitors.

continues on reverse

WHERE CAN I TAKE MY DOG OFF LEASH?

You can allow your dog off leash under voice control in these areas. In most other areas of the Park, your dog must be on leash. In some areas, pets are prohibited entirely to protect sensitive resources.

SAN FRANCISCO

Ocean Beach

Dogs are allowed on Ocean Beach under voice control from Stairwell 1 south to Stairwell 21. Dogs must be on leash south of Stairwell 21 to Sloat Boulevard in order to protect the endangered Western Snowy Plover.

Fort Funston and Burton Beach

Dogs are permitted off leash under voice control in much of Fort Funston and on Phillip Burton Beach. However, dogs must be on leash in the Bank Swallow habitat area.

Baker Beach

Dogs are permitted, under voice control, on Baker Beach north of Lobos Creek. Dogs must be on leash south of Lobos Creek and in parking lots and picnic areas.

Crissy Field and Beach

Dogs may be off leash under voice control on Crissy Field east of the West Gate of the Golden Gate Promenade, and north of New Mason Street. Dogs must be on leash west of the West Gate of the Golden Gate Promenade and south of New Mason Street throughout the area. Dog owners must keep their dogs out of fenced dune areas.

West Pacific Avenue

Dogs may be off leash under voice control along the corridor adjoining West Pacific Avenue from the Broadway Street entrance to the 14th Avenue gate. Dogs must be on leash in the forest and fields east of Lovers Lane and north of the Ecology Trail.

MARIN COUNTY

Rodeo Beach

Dogs are permitted off leash under voice control on Rodeo Beach from the shoreline to the crest of the dune. Dogs must be leashed from the crest of the dunes inland to Rodeo Lagoon and in the parking lots and picnic areas.

Oakwood Valley

Dogs are permitted off leash under voice control on, and immediately adjacent to, the Oakwood Valley Trail north of the small cattle pond. Dogs are not allowed off leash south of the pond, and may not enter the pond.

Muir Beach

Dogs are permitted off leash under voice control on Muir Beach from the shoreline to the crest of the dunes. Dogs must be leashed from the crest of the dunes inland to Big Lagoon and in parking lots and picnic areas.

Remember, people, dogs, and wildlife can enjoy this park together if you follow these rules. Please do your part.

FOFUAR01551

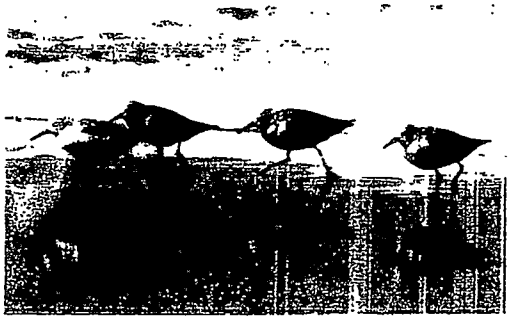
IDENTIFYING THE WESTERN SNOWY PLOVER

"Is that a plover or a sanderling?"

SNOWY PLOVERS

On Ocean Beach, Snowy Plovers often "hang out" with other shorebirds, especially sanderlings. The two may be easily confused, although with binoculars the differences are easier to see. **Snowy Plovers** stand about 6 inches high with pale backs and plump profiles. They have dark markings across the forehead, behind the eyes, and forming a partial breast band. **Sanderlings** stand around 8 inches tall, with longer beaks and less distinctive markings.

If these shorebirds are resting hunkered down in depressions in the sand, they are almost impossible to distinguish from each other, as they both have the light sandy camouflage coloring on their backs. Watch their feeding behavior, though. Sanderlings will sprint together in the surf to snatch up the exposed crustaceans in the retreating waves. Plovers will pause, look, run, and seize their prey -- mostly flies and other insects on the kelp and other debris left by the high tide.



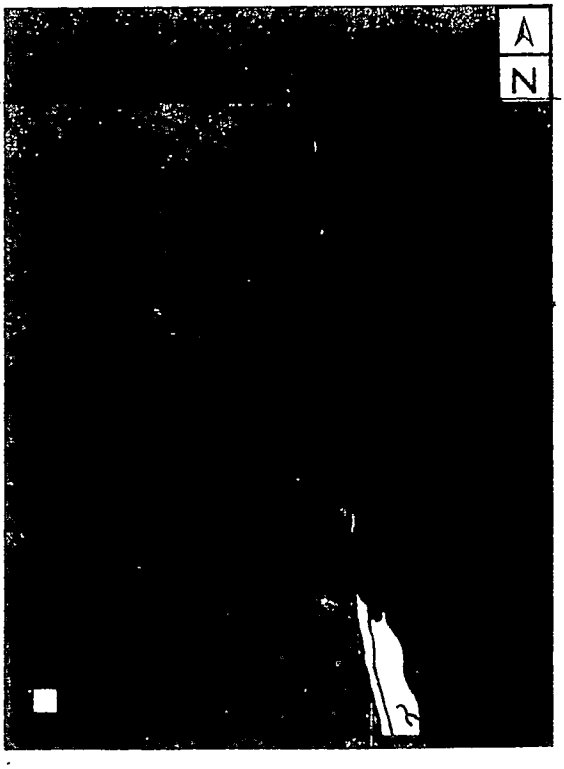
SANDERLINGS

Photos courtesy of Gary R. Nichols

BE THEIR GUEST

As a park visitor, we ask that you respect the wildlife by being the ideal guest in their home.

To ensure the protection of these threatened birds, all dogs must be leashed on Ocean Beach from Stairwell #21 south to Sloat Blvd.



You could be issued a citation and fined under the Code of Federal Regulations (CFR) for not having your dog on a leash within this area.

You can walk your dog off-leash, under voice control, at the north end of Ocean Beach and south of the Sloat parking lot until you reach the Bank Swallow Habitat Restoration Site.

Do not collect or remove any surf-cast kelp, driftwood, or other natural debris as many birds, including the plovers, will forage off of it. You can also be sensitive to the needs of shorebirds by not flying your kite near them. The birds see a kite as an attacking predator.

If you notice any disturbance or threat to the plovers, please call (415) 561-5505. If you want to help out even more, join the NPS Snowy Plover Monitoring Team or help us educate others about this bird's plight.

FOFUAR01552

There are a host of other volunteer opportunities within your park. Just call the Volunteer Office at (415) 561-4325 for more information.

Perhaps some day this story will have an inspirational ending:
"The Might of the Plovers!"

GGNRA007727

Golden Gate

National Recreation Area
National Park Service
U.S. Department of the Interior

PLIGHT OF THE PLOVERS

© A. Morris/VIREO

A BIRD IN DANGER

The Western Snowy Plover (Chadrius alexandrinus nivosus) is a small, pale shorebird with a sad story to tell. Once numbering in the thousands, it is estimated that only 1200 - 1600 of this species' coastal population survives along the Pacific coast from Washington to Baja California. Almost 5% of them reside on Ocean Beach during their non-nesting season!

Their coastal habitat of flat, sandy beaches has been dramatically reduced by urban development, the spread of non-native dune plants and increased human recreational use. As these beach habitats become more popular for people, roaming dogs, and off-road vehicle use, plovers are increasingly threatened.

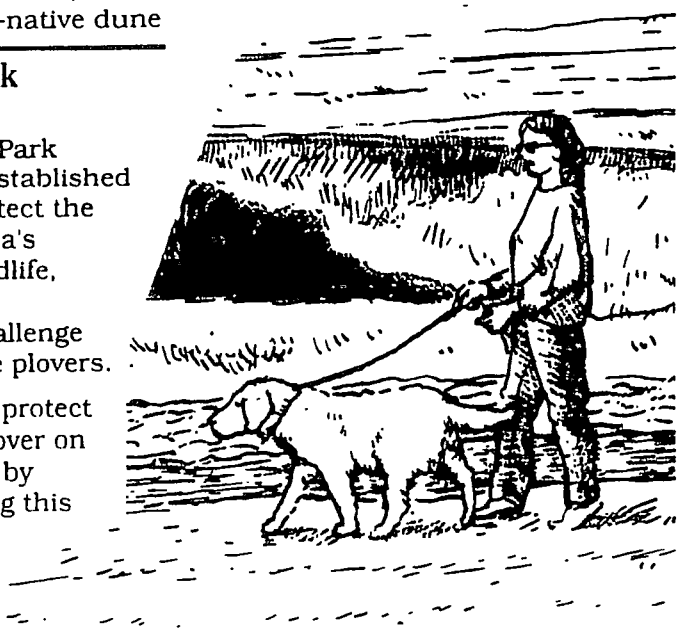
OCEAN BEACH: Your National Park

Ocean Beach is a 5-mile strip of coastline on the western edge of San Francisco extending from the Cliff House to Fort Funston. It is part of the Golden Gate National Recreation Area (GGNRA) and is managed by the National Park Service.

In March 1993, the coastal population of the Snowy Plover was listed as a threatened species, and is now protected under the Endangered Species Act.

The National Park Service was established in part to protect the last of America's vanishing wildlife, and faces an important challenge in helping the plovers.

You can help protect the Snowy Plover on Ocean Beach by understanding this bird's plight.



FOFUAR01553

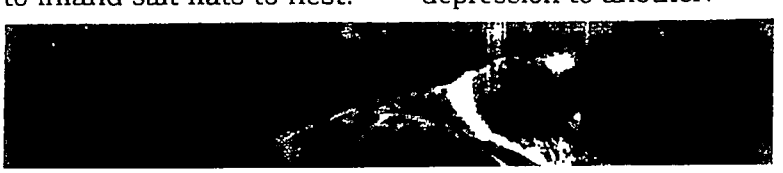
A DAY IN THE LIFE OF AN OCEAN BEACH SNOWY PLOVER

During their months in San Francisco (July through April), Snowy Plovers spend their days like we would want to -- eating and resting. They build up fat reserves for breeding and then move up and down the coast and to inland salt flats to nest.

When resting, they choose depressions in the sand, such as shallow footprints, where they are camouflaged and out of the wind. If disturbed, they will usually walk and "bump" one another from one depression to another.

It is imperative that the Snowy Plovers do not become agitated enough to take flight as this uses up valuable stored energy reserves and could jeopardize their breeding success.

Park visitors, such as joggers, walkers, and horseback riders, do not seem to bother the birds very much. However, dogs focus their chase



GGNRA007728

cy: O'Neill

August 4, 2000

HANCOCK
ROTHERT &
BUNSHOFT
LLP
ATTORNEYS

Brian O'Neill
General Superintendent
Golden Gate National Recreation Area
Fort Mason, Bldg. 201
San Francisco, California 94123

Re: Fort Funston Closures

Dear Mr. O'Neill:

I am writing this letter on behalf of the San Francisco Society for Prevention of Cruelty to Animals ("SPCA") to address issues regarding Golden Gate National Recreation Area's ("GGNRA") notice received on Monday by the SPCA of notice and comment for federal rule-making of the "Proposed Habitat Protection Closure" at Fort Funston. We saw a similar notice posted at Fort Funston, advising that there was a "Document for Public Review and Comment" ("Document") at the Sunset Library, Fort Funston Visitor's Center, and the National Park Service ("NPS") Information Center downtown. This letter addresses concerns regarding inadequate public notice and procedural defects in the rule-making process described in the Document.

As indicated by the Document, this process was initiated because the "Federal District Court ordered preliminary injunction against the NPS, disallowing the closure until such time as appropriate public notice and opportunity for comment was provided." Yet a quick review of the proposal reveals the closure is substantially different from the one that resulted in the preliminary injunction in the lawsuit, *Ft. Funston Dog Walkers v. Babbitt, No. C 00-00877 N.D. Cal.* The new proposal extends the four and a half acre permanent closure to twelve acres taking even more recreational parkland, banning public access to all bluff views of the beach for the entire northern sector of Fort Funston. Despite drastic changes in the project only sixty days have been allotted for public comment. Moreover, people are told to file comments "as early as possible" if they want to be heard: "Public comments should be submitted to NPS as early as possible in order to assure their maximum consideration." The statement indicates NPS is not committed to providing an opportunity for meaningful public review, rather the rule-making process is merely a procedural hurdle before proceeding with the project.

[SFDOC:800-380-423025]

Ultimately the court will decide whether there was "appropriate notice and opportunity for comment." This letter addresses serious problems with the rule-making process that could result in court reversal if not corrected. Public notice is inadequate, there is no provision for public review of the documents relied on for the proposal, and access has been denied to the area in controversy.

1. Effective Notice of the Proposed Closure

Although the sixty day comment period ran from publication in the federal register, GGNRA delayed posting notice of the proposed closure at Fort Funston for almost two weeks. As a general rule of land use practice, "appropriate notice" for public urban parks requires that signs be posted at the site where the proposed changes will occur. In contrast to other national parks, GGNRA has **unique** provisions in the enabling statute that require NPS to follow "principles of land use planning." In particular, the statute mandates: "In management of the recreation area, the Secretary of Interior ...**shall** utilize the resources in a manner which will provide for recreation and educational opportunities **consistent with sound principles of land use planning and management**." 16 USC, section 460bb. The "statement of purpose" further provides that the park was established "to provide for the maintenance of needed recreational open space **necessary to urban environment and planning**". Due process rights impacted by land use planning and development in an urban environment require that notice be posted at the site. The U.S. Supreme Court has defined adequate notice for due process to require: "notice reasonably calculated, under all the circumstances, to apprise interested parties of the pendency of the action and afford them an opportunity to present their objections." *Mullane v. Central Hanover Bank & Trust Co.* 339 U.S. 306, 314 (1950); *See, also Harris v. County of Riverside* 904 F.2d 497, 503 (9th Cir. 1989).

Second, no effort has been made to advise occasional users that their access to the entire northern bluffs in the park will be affected by this proposal. GGNRA estimates 750,000 "visitors enjoy Fort Funston annually," virtually the entire population of San Francisco (pg. 6). Extensive media coverage followed the original closure in March, yet GGNRA has done nothing to advise the general public of the latest development in the case. Typically in cases that affect the general public, notice is published in newspapers of general circulation. "The means employed must be such as one desirous of actually informing the absentee might reasonably adopt." *Mullane* 339 U.S. at 315. Clearly the intent is to limit public input, not facilitate it.

Further evidence of this intent occurs in the notice posted at Fort Funston. Only two signs were observed, one located on the backside of the bulletin board at the head of the Sunset Trail, hidden from public view, and the other at the bulletin board near the beach access trail, adjacent to a sign on the fence indicating "seasonal closure". In small print, the signs advise people that a document is available for review and comment at three locations and that comments are due by September 18th. No reference is made to the August 29th hearing of the Citizens Advisory Commission where comments can be made. Nothing is said about the expansion of the proposed habitat. Public confusion stifles dissent, since people tend to accept the fences as a fiat accompli, unaware that they will be moved to enclose more space if the

project is approved. Again, " notice must be of such a nature as reasonably to convey the required information." *Mullane* 339 U.S. at 314.

2. Public Access to Documents

The Document is silent on public inspection of the documents relied on for the closure. Three pages of reference material is cited at the end of the report, including "personal communications" with twelve individuals. Without access to this information, the public can't provide meaningful comment. Please make these documents available for public review during the comment period and advise the public where they can reviewed. With respect to the "personal communications" please provide access to minutes, tape recordings, summaries, raw notes, and any other memorialization of the communications. In addition, please provide the dates of the communications, who was present, what was discussed, conclusions reached, and the basis for those conclusions. We also ask you to extend the deadline for comment until these defects are cured.

3. Public Access to Areas Closed in March, 2,000

Since March public access has been denied to the entire fenced off area. After the bank swallows leave this month, the court ordered injunction requires NPS to open gates to the seasonal closure and provide access to the beach near the nesting sites. We ask you to include the Sand Spur Trail and the beach access trail adjacent to the 1995 closure, pending final determination of the new proposal. Public access to these areas were wrongfully denied during the original closure and inspection of the area is necessary to provide meaningful evaluation of the project.

4. Status of Battery Davis Closure and Other Designated Native Plant Areas

The justification for the "Proposed Habitat Protection Closure" does not address the status of other so-called native plant closures and projects at Fort Funston. Under various pretexts, GGNRA has removed recreational land from public use in several areas of the park in violation of its statutory mandate and NPS regulations requiring comprehensive park planning and development pursuant to public review.

In addition to the ten acre closure that resulted in the lawsuit, the following areas have had a substantial impact on recreational access to the park. Under the pretext of erosion control, nine acres adjacent to Battery Davis was fenced off in 1995, a temporary five year closure for native plant restoration which is still closed. The entire coastal bluff area below the hang glider platform was closed in 1998 for native plant revegetation. Last year, safety was used to rationalize the destruction of a paved "disability trail" and closure of several acres along the Sunset Trail adjacent to the former Battery Davis

closure.[1] Documents from 1992 and 1996 show various proposals to convert that area to a native plant habitat. Recently other native plant projects have been initiated, one near the paved road leading down to Lake Merced, another in front of the Fort Funston Visitor Center. These projects destroy "exotic" trees, bushes, and ice plants and result in further reduction of recreational access to parkland.

All projects were initiated without public review in violation of the statutory mandate requiring land use planning.[2] Even more significant, NPS regulations mandate "management plans" for the destruction of exotic plants with "provisions for public review and comment". (Management Policies Biological Resources Section 4:12-13; Natural Resources Management Guidelines NPS- 77, pg. 289.) These regulations were promulgated to deal with a typical national park where an invasive exotic species is impacting a native plant ecology. Just the opposite situation exists at Fort Funston, NPS is destroying an exotic plant ecology and developing a native plant ecology. Public input is mandated where development plans destroy park resources. Consider also that over twenty per cent of Funston has been closed to recreational access in areas where this activity is most concentrated without coordinated park planning, environmental impact analysis, or public input. Instead of addressing a situation that is clearly out of control, NPS embarks on federal rule-making limited to a very controversial parcel of land without adequate notice or an opportunity to develop meaningful public input.

Finally, retaliatory actions in response to the lawsuit have been initiated by GGNRA in the last few weeks. Our client has asked us to evaluate the removal of voice control signs at Fort Funston and Crissy Field.

Sincerely yours.

HANCOCK ROTHERT AND BUNSHOFT, LLP

Kenneth D. Ayers

cc: Edwin J. Sayres, President, The San Francisco SPCA

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[1] Without public review or prior notice, GGNRA sent a bulldozer out to Funston in December, 1999 and began ripping up a substantial section of the only "disability trail" at Funston. NPS Management Policies on Accessibility for Disabled Persons require NPS to make "every reasonable effort ..to make facilities ...accessible to and usable ..for the disabled... The determination of what is reasonable will be made after consultation with disabled persons or their representatives." NPS Management Policies, Visitor Use Section, pg. 4; 43 CFR 17

[2] After the lawsuit was filed, the Sunset Trail area was reopened to the public and native plant habitat signs were removed from Battery Davis fences and the south coastal bluffs.

San Francisco
State University

Biology Department

1600 Holloway Avenue
San Francisco, California 94132

Tel: 415/338-1548
Fax: 415/338-2295

16 August 2000

Brian O'Neill, Superintendent
GGNRA
Fort Mason, Bldg 201
San Francisco, CA 94123

Dear Mr. O'Neill:

I understand that on 28 August 2000 there will be a public meeting concerning the closure of a small portion of the Fort Funston property for the protection of the bank swallow population that lives there. I want to personally express my support for the closure that protects a rare and endangered species. As a professional biologist, I know how important it is that every effort like this be made for the maintenance of our natural systems. I view this a essential for property managed by agents of the National Park System. I also understand that this action is contested by some citizens who use the site. I feel the site is more that large enough for your closure action with more than enough space left for the activities of the others. Please don't give in to such pressure. Please view this letter as a contribution to the public meeting as I will not be in town on the 28th.

I am aware of a few general statistics about this case, for example, that the Fort Funston site is one of only 2 nesting sites in coastal California for the bank swallow. Also, that the park plans to close only a small area of roughly 3-5 acres, with an additional several acres seasonally during nesting. Considering the size of Fort Funston, this is clearly only a modest effort to protect this endangered species. Clearly the park must make this effort as it is a mandate for parks to protect natural resources for the future. Your group would probably be liable for violation of National Park principles for failing to do so. Knowing so many who work for the GGNRA, I am certain that it is their strong desire to protect this rare species.

I have been watching the efforts of the GGNRA for the past 20 years as an ecologist at San Francisco State University. I have conducted ecological research on GGNRA property and my home in Pacifica sits below GGNRA property. I am extremely pleased as a biologist and as a citizen at all the efforts the GGNRA has made at restoration of a number of locations, including the dune areas at Fort Funston. I support this closure, especially as a biologist, but also as a citizen.

Back in the late 1980's, I organized a number of faculty at SFSU to initiate the first graduate program in conservation biology in California and I served as the first acting director. My research has focused on conservation, ecological land management and the restoration of natural habitats. I feel that your actions are needed and minimal, and hope that you will not permit the pressure of self-interest groups spoil the future of our joint natural heritage.

Sincerely,

V. Thomas Parker, Ph.D.
Professor of Biology

FOFUAR01558

Jamie Hoff
672 4th Ave.
San Bruno, CA 94066

September 8, 2000

SUSPENSED CORRESPONDENCE

ACTION PERSON: Yvette Ruan

REPLY DUE
SUPT'S OFFICE: Sept 29, 2000

COPIES PROVIDED Scott
OR FORWARDED File
VIA CC:MAIL Melissa Aguilar
P.00-52.2 Funston Files

RECEIVED
SEP 11 2000
SUPERINTENDENT'S OFFICE

Brian O'Neill
Fort Mason Bldg. 201
San Francisco, CA 94123

Dear Mr. O'Niell,

I am writting to you today because of my concern about dog walking services and horses. I am a rider and a dog owner. I love that dogs can come to Fort Funston and be off leash as long as the dogs behave. I have been riding for 2 years at the Golden Gate National Rec. area and really love everything about it except when dogs get out of control. There have been numerous occasions where a dog or several dogs have come after my horse. The ones I feel that are the most a problem are the dog walkers that have well over the amount of dogs for any one person to handle. A lot of times these services have 10 to 15 dogs all off leash and it's usually the men who do not have any leashes anywhere nor do they make an attempt to keep the dogs away from my horse. Fortunately my horse isn't afraid of dogs but he has gotten very aggrevated at the dogs and has tried to kick at them. This is where it is dangerous for me because I could be thrown off. On September 5,2000 there was a man who had 15 or more dogs. None of them had a leash. I was head back towards the stables on the beach north of the sewer pump out. This man made no effort to retrieve one of the dogs that were with him when the dog came after My horse and I. The dog was a rotty. We went into the surf to try to discourage the dog and all the while the dog was continously barking and darting at my horse's legs. This went on for about a 1/4 mile with no efforts from the dog walker to retrieve his charge. My horse was getting very irritated so Finally I decided to chase the dog back to his dog walker. We came out of the waves and the dog, while constantly barking, ran in circles after my horse. We finally were able to get the dog to go straight in which we proceeded to chase the dog back to the dog walker. The dog walker said nothing,but looked at me as if I were crazy to be chasing this dog. When we turned to leave another dog broke from the group to chase us. We turned to face this dog and the dog returned out of fear. Again the dog walker had made no attempt to call back the other dog. No words were exchanged on my part or his. I said nothing due to his attitude.

On Sept. 7 2000 another gentleman had 7 large dogs and no leash. I believe he was also a dog walking service. He had a doberman that kept charging from behind. Although he would call the dog back he did nothing to stop the dog from repeatedly charging and barking at my horse.

A few months back from a very large group of dogs, with a male attendant with them, 2

DEPARTMENT OF THE INTERIOR

SPECIAL

FOFUAR01559

GGNRA007734

very vicious dogs broke from the pack and came at my horse. Barking with teeth bared they were trying to bite my horse. The man did nothing to retrieve them. Fortunately my horse was able to avoid injury.
These are just but a few of the examples of my experiences. There have been incidences with single dog owners too. But I feel that the dog walkers pose a much larger danger to all concerned. Mainly because you can get 2 or more dogs attacking you and this really makes it impossible for a horse to defend him self.

I also know of someone whose horse was attacked by several dogs and the guy was yelling at her saying it was her fault. She was so upset by this she vomited .
Here a few suggestions I have.

1 anyone with more than 3 dogs to one person should
a. be confined to a designated fenced area off leash or
b. all dogs be leashed at all times or
c. no dog walking services aloud on the beach or
d. limit how many dogs a single person should have
2. I never see the rangers on the beach and if the rangers had horses to ride to patrol the beach they would see what we're talking about. Then these people would get sited on the spot. If this happened more often then perhaps all dog owners would be more responsible Because a lot of the time by the time you get to the rangers office the person could be long gone. Maybe the rangers could work something out with the nearby stables that rents out horses. Because that stables would have a vested interest in getting something done. If not them then maybe the mounted police horses at GG park.
You may use this letter but I would like my name change or remove. I want to remain anonymous. I bring my dog here too. He comes with me once a week when I ride.
I would also like to say again that I have nothing against dogs being there as long as they are under control. Unfortunately this is not the case.

Sincerely,
Jamie Hoff
Jamie Hoff

10:18 Sept 14
Mrs Hoff called to see whether we got her letter. She's telling riders to pls write letters to let us know if dog harasses or attack their horses. I reminded her to tell others to remain to file a complaint w/ USPP.
Janet
9/14

Dog walking not illegal at Fort Funston

Steven Krefting makes several misstatements in his recently published letter on Fort Funston (Letters, August 26).

The Independent correctly "failed to mention ... that off-leash dog-walking is illegal," because it is not illegal. The Golden Gate National Recreation Area Advisory Commission issued "Approved Guidelines for a Pet Policy" in 1979, a document that lists no restrictions at Fort Funston. The advisory commission also stated during hearings that regulations designed for a wilderness area "do not really apply in an urban area."

Krefting also repeats the unfounded statement made by the National Park Service that "dogs and people ... erode the sensitive dunes and bluffs." No evidence has been presented for this claim. In fact, the GGNRA proposal states that the bluffs erode naturally about one foot a year, which is far beyond any insignificant erosion caused by walkers.

As for asking restoration-work volunteers at Fort Funston what they think of off-leash dogs, we should ask them, "When was the last time you were at Fort Funston?" I talked to many of them as they worked last spring. They had never been to Fort Funston before and they didn't know they were participating in a land closure. Some assured me, in complete sincerity, that my dog and I would always be welcome on the dunes.

A handful of occasional users and non-users of Fort Funston should not be allowed to evict the thousands of legitimate recreational users who visit this fine urban park each week.

Thank you, Independent, for your attention to this crucial local matter.

KEITH MCALLISTER

29 AUGUST 2000 8A

Fort Funston is not Yosemite

I am writing to thank you for the well-written editorial on Fort Funston ("Feds not playing fair at Fort Funston," August 19). That editorial clearly shows that the *Independent* truly cares and listens to many Sunset residents who visit Fort Funston on a regular basis.

I am also writing in response to Steven Krefting's letter published in the August 26 edition. Krefting said that "one fact your source failed to mention is that off-leash dog walking is illegal on any national park land by federal law ...." Well, the fact is the Golden Gate National Recreation Area, which is funded by our tax dollars, failed to allow public input on the ten-acre closure, in violation of the law.

My family and I are environmentalists. But we are also sensible environmentalists. Fort Funston may be classified as a national park unit, but it is not comparable to Yosemite, Yellowstone, or Death Valley. Fort Funston is a national park unit in what is now an urban environment.

I would like to invite Krefting out to Fort Funston with my family and our dog. We want to show him and the GGNRA that off-leash dogs are well behaved, and that we are sensible and responsible people. The issue is not dog walkers versus the bank swallows and the native plants. Clearly, the issue here is why the GGNRA continues to ignore and deceive, as your editorial stated, "members of the public that fund its operations with their tax dollars."

MIKE DOANE

5 SEPT. 2000 8A

S.F. INDEPENDENT

FOFUAR01561

GGNRA007736

Cy: Mary

THE INDEPENDENT

JOHN TA CHUAN FANG
Publisher Emeritus

TED FANG
Editor & Publisher

ZORAN BASICH
Managing Editor

EDITORIAL

Feds not playing fair at Fort Funston

It's not often that an agency charged by a judge of violating federal law and ignoring public input uses the opportunity to stick it to the public once again. But it appears the Golden Gate National Recreation Area is trying to do just that in the ongoing battle over the public use of Fort Funston.

The 50-acre recreational park has long been a favorite of residents attracted to its winding trails and plant and animal life. It has been a special spot for dog owners — Fort Funston is a veritable hound heaven, especially on weekends, when hundreds of dogs and their owners enjoy the fresh ocean air at the cliffside park.

But those same dog owners decry the GGNRA's management of the areas, saying that the federal agency's plan to make large chunks of the park inaccessible to the public, ostensibly to preserve bird species, was formulated without proper public input.

A judge agreed, and recently ordered the GGNRA to tear down the public barriers once a flock of migratory swallows leaves for the season.

But dog owners and others were shocked to find that the GGNRA had altered its closure plan significantly, and that the agency now intends to close 12 acres of the park, rather than the 10 acres previously identified for closure.

It's no surprise that the GGNRA is playing fast and loose with the concept of public input — the federal agency has a long history of being less than open with the residents to whom it is supposed to be accountable.

> Combined with previous closures, the GGNRA's new plan would make more than half of Fort Funston inaccessible.

What's more unusual is that neighbors who thought they had gained a hard-won victory now find themselves faced with the prospect of an even less acceptable set of circumstances. Not only does the agency plan to close 12 acres, it plans to institute the closure permanently, not seasonally.

Combined with previous closures, the new plan would make more than half of Fort Funston inaccessible to the public.

We're sensitive to the GGNRA's responsibility to protect wildlife at Fort Funston, and their emphasis on that point is to be commended — although there is much debate over whether the closure policy will really help the birds.

What is not commendable is the way the agency repeatedly runs roughshod over the concerns of park users. We urge the GGNRA to do a better job of listening to the members of the public that fund its operations with their tax dollars.

SAN FRANCISCO INDEPENDENT Aug 19, 2000 Pg 6A

Fort Funston is dog-friendly

Pets and people enjoy romping at the ocean beach at San Francisco's edge

By Michael Martinez
KNIGHT RIDDER NEWSPAPERS

Your dog can't tell you this, so we will: Fort Funston is doggy nirvana, a place so full of discovery and great smells your pet won't want to go home.

People have been coming to Fort Funston for nearly four decades, making it the most popular spot for dogs and their owners in the Bay Area. Some 700,000 people each year visit the area — part of the Golden Gate National Recreation Area — and most of them bring their pets for the miles of beaches and dunes that make it one big, happy playground.

Off Skyline Boulevard in San Francisco, Fort Funston — actually, a better name might be Fort Fundog — is large and easy to find. You'll know you're there because dogs are everywhere, jumping excitedly in the parking lot, exploring patches of ice plant and traipsing along the paved roads leading to the cliffs above the beach.

There are a number of walkways that twist through the dunes, and virtually all of them wind up on the beach below. Just follow the crowds — or the beach-access signs. On weekends, the beach can be filled with literally hundreds of unleashed dogs, but when the weather is cool and overcast, it is less crowded and undoubtedly more enjoyable.

Visitors who plan on staying a few hours might want to pack a lunch and eat at one of the picnic tables or benches along the pathways since there are no nearby restaurants. Among the more intriguing sights are hang-gliders taking off and landing just off the parking lot and surfers catching waves on the beach to the north.

For dogs — even the water-phobic breeds — there is no end to the enjoyment. They can dig holes in the sand, chase sticks or find playmates. One reason Fort Funston has endured as a popular spot is because owners, for the most part, are diligent about cleaning up their dogs' messes. The 700-member Fort Funston Dog Walkers help keep the area tidy and trash-free, providing ample containers and bags for cleanup.

One caveat: Leash laws still apply, but rangers don't typically enforce them because of the area's history of pet activity. Only those dogs who have been socialized and who respond to their owners' commands should be allowed to wander freely. Others are best kept on leash.

Another caveat: Owners should be aware that certain areas of the dunes are fenced off for seasonal use only. They're closed from mid-March to mid-August as bank swallows raise their young.

But even with some areas closed, there is plenty of room for roaming and romping. Best of all, your dog will sleep the rest of the day once he returns home.

IF YOU GO

Getting there: From the East Bay, cross the Bay Bridge to San Francisco and pick up Interstate 280 southbound. In Daly City, exit on John Daly Boulevard and drive west to Skyline Drive (Highway 35). Proceed north on Skyline several miles to John Muir Drive, then make a U-turn and drive about half a mile to the Fort Funston marker on the right side of the road. Follow the road to the parking area.

Hours: The Fort Funston parking lot is open until sunset. The ranger station is open from 8:30 a.m. to 5 p.m.

Nearby: The visitor center has a number of brochures about activities at Fort Funston as well as exhibits on nature, plant restoration and guns that were used in military defense positions during World War II.

Information: Call 415-239-2366 or visit www.nps.gov/goga; the Web site has maps and schedules of park events. The Fort Funston Dog Walkers can be reached by calling Linda McKay at 415-273-5715; the group's Web address is www.dogwalkers.org.

National Parks

$2.50

The Magazine of The National Parks Conservation Association

JULY/AUGUST 2000

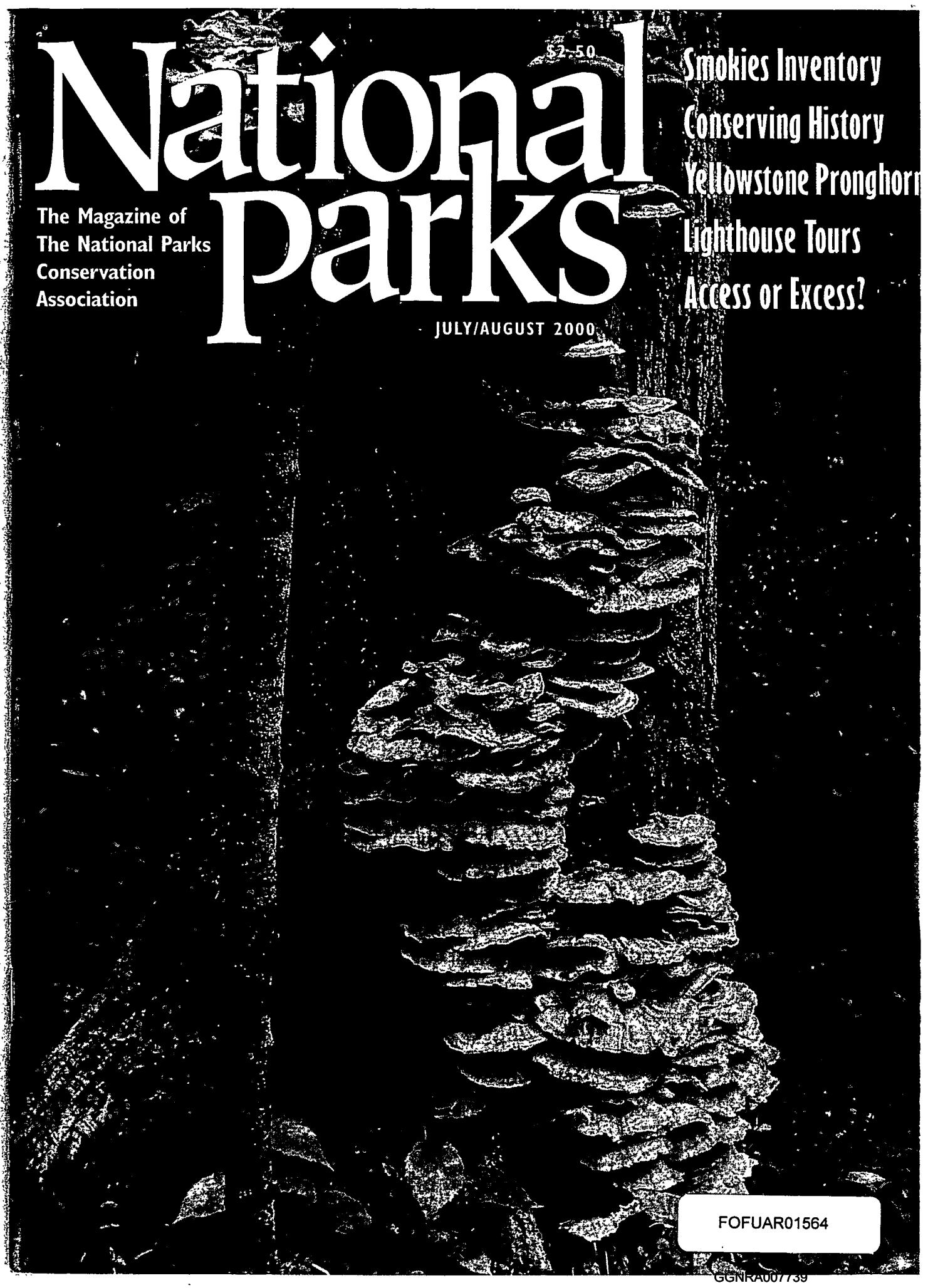
Smokies Inventory

Conserving History

Yellowstone Pronghorn

Lighthouse Tours

Access or Excess?



RESOURCE PROTECTION

Golden Gate NRA Officials Caught In a Dog Fight

NPS tries to protect birds and gets sued by dog owners.

SAN FRANCISCO, CALIF.— Without watching where managerial flexibilty was leading them, managers at Golden Gate National Recreation Area (GGNRA) have stepped into a different kind of dog mess.

Though off-leash dog walking is not permitted in any unit of the National Park System, managers at GGNRA have allowed the activity along the bluffs at Fort Funston through a superintendent's compendium. The provision is meant to allow superintendents flexibility for unique situations. But when the Park Service recently fenced off a small section of the area to protect a threatened bird's critical nesting habitat, the dog walkers sued the National Park Service (NPS). At press time, the dog owners were a step closer to running their dogs through the protected area.

A U.S. District Court judge has issued a preliminary ruling in favor of the dog owners, who argued that NPS violated its own regulations when it closed the area without public notification. The plaintiffs, led by the Fort Funston Dog Walkers, say that they are not opposed to protecting the bird's habitat but that a public comment period was required. That period would have allowed them to suggest ways to protect the area without banning them from one of the few places in San Francisco where they are able to run their dogs unleashed, says Lydia Boesch, attorney for the plaintiffs.

The six-acre area was fenced off primarily to protect bank swallows that return from South America each March to nest in the sand cliffs below. The birds remain through August and make up one of two remaining colonies with coastal nesting sites in California. Bank swallows are a state threatened species but are not federally listed as threatened or endangered. The Park Service also used the closure to reestablish native plants, which had been eradicated by nonnative vegetation.

In his statement, Judge William Alsup said that the plaintiffs have shown probability that NPS violated its own regulations requiring notice and has asked both sides to provide possible remedies for the action. Except in emergency situations, NPS regulations require notice and public comment before closure of a park area that is of a

SUSANNA FROHMAN/SAN FRANCISCO CHRONICLE

Dogs at play at Fort Funston in Golden Gate National Recreation Area.

"highly controversial nature" or that result in "a significant alteration in public use pattern of the park area." On that technical aspect of the case, the Park Service argued that it provided notification through several venues and went beyond what was necessary for such a minor closure.

The agency would not comment because the case is ongoing, but in its testimony, NPS stated, "while the dog-walking community has been vocal in its opposition to the park's closures at Fort Funston, they represent only a small portion of the...array of visitors Fort Funston accommodates...Contrary to plaintiff's assertions, these actions neither significantly alter the public use pattern of Golden Gate National Recreation Area nor are highly controversial in nature. The permanent closure is less than four acres in size, while the entirety of Fort Funston is 230 acres." Two additional acres would be closed temporarily during the season.

The case has far greater implications than simply allowing unleashed dog walking in national parks, said Brian e, NPCA's Pacific regional director. e judge has clearly not grasped the consequences of forcing the Park Service to go through lengthy processes to create rules for routine actions to protect park resources," Huse said. "In this case, the Park Service attempted to set aside six acres to protect a threatened species—that shouldn't be a several-month process."

In its testimony, NPS suggested that the judge's ruling would hinder the agency unnecessarily. "If the NPS were required to invoke formal rulemaking for all public use restrictions and closures...the NPS ability to balance the competing uses of park resources would be severely compromised."

The fences will remain this year to protect the birds; however, if the judge rules for the plaintiffs, the Park Service may be required to remove them next year.

Dan Murphy, a past president of the Golden Gate Audubon Society and someone who has followed the swallow ny for more than 20 years, said that closure is necessary. Bank swallows will not return to nests when they perceive a threat from above, such as predatory birds, he said. In his observations, he has witnessed the same behavior when people or hang gliders are seen from above. "We don't know for sure how it affects them, but prudence would dictate that we make the space as large as possible," he said.

PRESERVATION

Petersburg Sites Losing Ground

Civil War sites threatened by suburban sprawl and industry.

PETERSBURG, VA. — Petersburg is being besieged once again. But this time it is suburban sprawl and industrial development that are encircling the town instead of Ulysses S. Grant's Union Army.

More than 100 battle sites have been identified in the area where a ten-month exchange between Union and Confederate armies eventually led to the end of the Civil War. But only six of the 22 sites deemed nationally significant by Congress are partially or wholly protected within the boundaries of Petersburg National Battlefield. The National Park Service (NPS) is fearful that those areas will be lost to homes and industrial parks because of growing development pressure.

"This isn't another Gettysburg where you have just one site," said park Superintendent Michael Hill. "Petersburg was a whole campaign that lasted months and included many battles."

The same roads and railroads that drew the Union Army to Petersburg in 1864 are enticing industry and residents there today. Petersburg sits within a vital transportation corridor that served as a supply route to the Confederate Army during the Civil War and now provides convenient shipping routes among the South's major cities. Businesses have been eager to relocate

FOFUAR01567

M. Scott
G. B. O'Neill
R. Weideman
C. Powell
R. Scott
N. Wakehall
D. Mannel
J. Kuan
R. Borjes
H. Levitt
G. Merkle
D. Hatch

A20 1/10/01

Preserve Fort Funston

Editor – Regarding a letter to the editor (Jan. 6) about a decision to close off 12 acres of Fort Funston to off-leash dogs: Many of us who value Fort Funston as a recreational area are in complete agreement with the National Park Service's sensible rules for preserving the natural environment of the dunes and beach.

The area that has been closed off is only about 5 percent of the 230 acres that make up Fort Funston. The preservation of native plants and endangered birds makes the entire beach area more beautiful for all of us.

The areas that have been restored to native plants are much more alive than they used to be. The birds have returned as well as butterflies and other insects. The whole area is more inviting and enjoyable because of the change.

The bank swallows are an important part of that environment. Having a few acres of a large park closed to dogs and pedestrians is a small price to pay for the increased beauty.

Fort Funston is supposed to be a recreational area for all users, not just for dog owners. While I understand the desire of some people to let their dogs run free, they must know that their freedom can hurt other creatures and people.

It has become impossible for me to go to Fort Funston with my niece and her two young boys because the unleashed and often uncontrolled dogs are frightening to young children. We need to work together to keep the park accessible to all of the people in the Bay Area who enjoy this unique natural location.

ADELE FASICK
San Francisco

Cc: ONeill
Roger
Chris Powell
Nicole
Ralph
Mary

Help Stop Threat to Rare Swallow Colony in Golden Gate National Recreation Area

The National Park Service (NPS) has recently announced plans to protect a rare colony of coastal-nesting bank swallows and one of the Bay Area's last remnants of coastal sand dunes and bluffs. But organized opposition from vocal dog walkers may undermine their efforts. Your help is needed to protect the threatened swallows and dunes!

On the face of a windswept bluff overlooking the Pacific in far southeastern San Francisco, a cluster of small burrows marks the site of one of the only two bank swallow colonies on the entire California coast. The fragile bluffs are one of the best continuous exposures of the last 2 million years of California geologic history found in the state. Just inland is a remnant of what was once the most extensive coastal dune system in the West, where volunteers have spent thousands of hours restoring native plant communities.

Unfortunately, over, through and around these sites hundreds of dogs run off-leash every day. The NPS has allowed dogs to run off-leash here for a number of years, even though it violates the law governing the management of national park lands. Free running dogs damage the sensitive dune and bluff habitats, scare wildlife and are an annoyance to other park visitors.

Ironically, managers of the Golden Gate National Recreation Area (GGNRA) have made numerous efforts in recent years to protect and restore the dune ecosystems, even while they allow dogs to undermine those efforts. **In 1999 alone, volunteers with the park put in over ten thousand hours of work planting native plants to beautify and stabilize the shifting sands.**

GGNRA staff have also struggled to protect the colony of bank swallows, which has declined precipitously - from 830 adult birds in 1994 to 132 adult birds last year. The migratory birds, as their name suggests, build burrows in suitable banks along rivers and beaches. The colony in the Fort Funston is jeopardized most by continuing erosion of the coastal bluffs they nest in, caused at least in part by human and canine activities. They are a listed *threatened species* under the California Endangered Species Act.

The park has studied the erosion for several years and has identified several causes. Some of the most serious threats are activities such as off-leash dog running and cliff climbing. Others include graffiti-carving in the soft sandstone, rescues of people and dogs trapped on the bluffs and the inadequate sand-holding ability of the non-native iceplant.

On July 14, the NPS officially proposed in the Federal Register a permanent closure of a 12-acre area of the northwest section of Fort Funston to protect the bank swallow habitat, "...enhance significant native plant communities, improve public safety and reduce human-induced impacts to the coastal bluffs and dunes, a significant geological feature."

The closure area, combined with existing closures for safety, revegetation and bank swallow protection, would total about 43 acres out of Fort Funston's 222 total acres. NPCA believes that this closure is essential to protecting the swallows and other valuable remnants of the habitats that once covered this area of the coast. In addition to the swallows, Fort Funston is one of only three sites in San Francisco where California quail still survive, along with burrowing owls, brush rabbits and other native wildlife.

See over for what you can do!

FOFUAR01570

GGNRA007745

What You Can Do

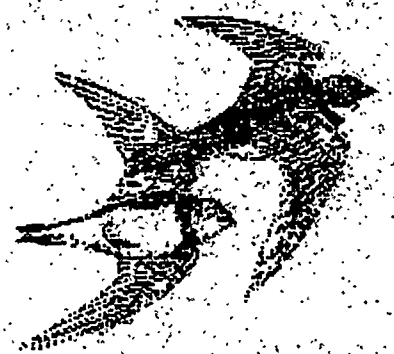
Please write a note or letter to the Park Service BY SEPT. 18, 2000 in support of this proposal. Make the following points:

- Preservation of the colony of threatened banks swallows must be a top priority in the management of Fort Funston. The park service should close the maximum area necessary to protect them.
- Native plant restoration on the dunes, as called for in the park's management plan, should also be a high priority to both enhance wildlife habitat and stabilize the sand.
- Visitor safety and preservation of native plants and wildlife are more important than allowing access to easily eroded cliffs and bluffs.
- Existing laws that require all dogs to be on leash in national parks and require visitors and dogs to remain on designated trails should be firmly enforced.

Send you comments by September 18 to:

Superintendent
Golden Gate National Recreation Area
Bay & Franklin Sts., Building 201
Fort Mason
San Francisco, CA 94123

Or fax them to: (415)561-4710



Or come to a meeting:

Public comments on the proposal can also be delivered at a meeting of the GGNRA Advisory Commission on **Tuesday, August 29 at 7:30 PM** at Building 201 in Fort Mason in San Francisco (through gate at Bay & Franklin Sts., then left at the stop sign).

Produced by the Pacific Regional Office of **National Parks Conservation Association**, *Protecting Parks for Future Generations*. Thanks for your help! Please let us know you've written a letter by sending an email to *pacific@npca.org* or calling (510)839-9922. To subscribe to a free email newsletter on park issues in the Pacific Region, send a message to: *lyris@lists.npca.org*. Make the message text (not the subject): *subscribe npca-ppan*

FOFUAR01571

RARE SWALLOW COLONY THREATENED – PLEASE HELP!

PACIFIC REGIONAL OFFICE
P.O. Box 1289
Oakland, CA 94604-1289
pacific@npca.org ◆ www.npca.org

Protecting Parks for Future Generations
NATIONAL PARKS CONSERVATION ASSOCIATION

California Native Plant Society

No. 1, July 2000

Action Alert
Fort Funston

In March a coalition of off-leash dog advocates sued the National Park Service to reopen six acres of dunes that had been closed in order to protect the bank swallow colony on the cliffs below. As one of the last significant remnants of the massive San Francisco dune complex, Fort Funston represents an essential unit in the recovery of our diverse dune flora and fauna. This flora will continue to decline unless the park protects what remains and restores areas damaged by decades of disturbance and rampant iceplant invasion.

We are sympathetic with the desire of some park visitors to allow their dogs to run without a leash. But such use often leads to conflicts with other visitors and damages resources; pets on leash have a much more limited impact. State and municipal park agencies throughout the region are beginning to recognize that creating dedicated areas for off-leash dog use is the only way to prevent conflicts among diverse park users. Developing dog parks is similar to developing a new soccer field: site selection considerations include parking availability, ability of the turf to sustain heavy use, fencing to protect pets, and so on. Such development, however, is inappropriate within a national park, particularly within a unit that has such marvelous natural resources.

Please take a moment to let the park know what you think about this issue. Your letter will have the greatest impact if you make the following points in your own words:

- The remnant coastal dune flora at Fort Funston deserves greater protection than it now receives. Iceplant (*Carpobrotus edulis*) is overtaking the diverse remnant native plant communities. In some areas, the trampling is so extensive that not even iceplant has survived.
- The Fort Funston Green Team and various stewardship activities led by the park's interpretative rangers are doing excellent work and should be expanded.
- The fenced area on the bluffs above the bank swallow nesting colony ought to be restored with native vegetation and protected from trampling.
- The Code of Federal Regulations, like the codes governing all California state parks and San Mateo County parks, states that all pets must be on a leash. Why is this regulation (36 CFR 2.15) not being enforced at Fort Funston? Natural resources and the visitor experience for diverse user groups are not adequately protected by the Golden Gate National Recreation Area's current policy of allowing dogs to roam off leash throughout most of Fort Funston.

Send your comments to:

Brian O'Neill, General Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, Calif. 94123

FOFUAR01572

Dedicated to the preservation of California native flora

GGNRA007747

To: Chris Powell
From: Steven K.

August 22, 2000

To the Editor:

Your editorial chastising the Park Service for its proposed closure at Fort Funston claims that the total closures would "make more than half of Fort Funston inaccessible." Fort Funston occupies 222 acres of land, not 50 acres as you claim. The total area closed, if the current proposal is adopted, would be less than 20 percent of the park's total acreage.

It is ironic that you rush to condemn the Park Service for doing precisely what some dog walkers asked for in their lawsuit – holding a public process. The Park Service also seems to be fulfilling the mandate given them by Congress when the Service was created in 1916, namely: "... to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

One fact your source failed to mention is that off-leash dog walking is illegal on any national park land by federal law, no matter what kind of park unit it is. Yet the Park Service has looked the other way for years at Fort Funston, while dogs and people wander off the trails and erode the sensitive dunes and bluffs. Last year nearly a thousand volunteers put in over 10,000 hours of restoration work at Fort Funston, including planting native plants on the dunes. Perhaps you should ask them what they think of the free-range dogs – they might have a slightly different take on the issue.

Sincerely,

Steven Krefting
National Parks Conservation Association

Education to strike concentrate on inno- y ways of cleaning up

oard of Supervisors can icularly problematic; as s up right around the e Tuesday Independent g to press. That's why lependent often covers blic hearings held by tees of the Board of sors — so we can give an in-depth look at ant subjects without to focus on pro forma at occur at the Monday s. But sometimes we get Monday's breaking to Tuesday's paper. An e of that is today's story posed "monster home" ion, which was intro- resterday afternoon's ting. We got wind of last week, and City Hall Eric Gershon pounded idors at the hall to get an preview of the legisla- no easy task as it was ing last-minute changes enabling him to file story. You can be sure we ow this story as it winds through the city's legisla- cess, as we believe it is e of great concern to rhood residents

om Prete; **NEIGHBORHOOD CONTRIBUTING EDITOR** Anita **TANT TO THE PUBLISHER** Bill **NG DIRECTOR** Diane Rames; Kelvin Blankenship; **RETAIL** la, Sheila Ferrucci; **SALE AND** ui; **CLASSIFIED ADVERTISING: SENTATIVES** Walter Weinthal, cKelvey; **CONTROLLER/BUSI-** Chan, Angeline Ong, Tina **URIER** Manuel Santamaria;

VERIFIED AUDIT CIRCULATION

Dog walking not illegal at Fort Funston

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The Independent correctly "failed to mention ... that off-leash dog-walking is illegal," because it is not illegal. The Golden Gate National Recreation Area Advisory Commission issued "Approved Guidelines for a Pet Policy" in 1979, a document that lists no restrictions at Fort Funston. The advisory commission also stated during hearings that regulations designed for a wilderness area "do not really apply in an urban area."

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As for asking restoration-work volunteers at Fort Funston what they think of off-leash dogs, we should ask them, "When was the last time you were at Fort Funston?" I talked to many of them as they worked last spring. They had never been to Fort Funston before and they didn't know they were participating in a land closure. Some assured me, in complete sincerity, that my dog and I would always be welcome on the dunes.

A handful of occasional users and non-users of Fort Funston should not be allowed to evict the thousands of legitimate recreational users who visit this fine urban park each week.

Thank you, Independent, for your attention to this crucial local matter.

KEITH MCALLISTER

Teacher-housing plan pits teachers against kids

M. Toby Levine has it wrong (Letters, August 22). We in the Sunset love our teachers. We already have them living among us, and we are proud they are in our community. The problem we have with the Board of Education's teacher-housing initiative is not the teachers and not the housing, but the loss of the children's playground at the Parkside Elementary School. It's just plain wrong to take away 40 percent of the school's play area to put in 43 housing units.

I am sure that Thomas Jefferson; the University of California, San Francisco; and the University of San Francisco did not have to take away vital land from elementary-school children in order to provide space for faculty housing. Neither should the Board of Education.

NANCY WUERFEL

Bashing of Main Library unwarranted

You recently printed James Chaffee's letter (Letters, August 22) in which he surmises that James Haas is "from Mars." Here on planet Earth, or, more specifically, San Francisco, the San Francisco public-library system does a wonderful job serving the needs and interests of the people of this city.

While there have been some unfortunate events around the development and construction of the new main library, appropriate actions to mitigate these have been taken. The city attorney pursued the responsible parties and collected the best possible settlement. The subsequent post-occupancy evaluation contained suggestions for improvements to the main library. Some of the suggestions will be implemented. Others are not feasible or otherwise not appropriate for implementation. The total sum of $28 million set forth in the evaluation for all the suggested improvements is in no way an obligation to be encumbered library will continue to provide the best possible its patrons.

I must also take issu continued bashing of Francisco Friends & Fo the Public Library. This tion has been stellar in of our public-library sy ing more than $1 milli most recently renovate structed branches, Mi Oceanview respectively.

It is truly unfortunate must see the San Franc Library glass as half-er everyone else rightly brimming with good a things for the city.

CHARLES A.
Acting Pres.
Francisco Publ
FOFUAR01574 C

Seniors need with Medicar payment

I love the Indepen look forward to the delivered to our house. smaller format is ex have subscribed to the for more than 51 years ly it is a bad paper — ads and not enough ne

I was pleased to see in the Independent inf low-income senior cit people with disabilitie may have a chance wh introduces a new Medi tance program. ("New to defray Medicare cost seniors, disabled," Aug

My husband is start fer from Alzheimer's di $60 a month is taken my small pension che husband's health care asking for charity, but elty to seniors. I wo clerk-typist for the city sion check is tiny once out the $60 per month. city will pay attention.

ESTHE

THE INDEPENDENT

JOHN TA CHUAN FANG
Publisher Emeritus

TED FANG
Editor & Publisher

ZORAN BASICH
Managing Editor

EDITORIAL

Feds not playing fair at Fort Funston

It's not often that an agency charged by a judge of violating federal law and ignoring public input uses the opportunity to stick it to the public once again. But it appears the Golden Gate National Recreation Area is trying to do just that in the ongoing battle over the public use of Fort Funston.

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But those same dog owners decry the GGNRA's management of the areas, saying that the federal agency's plan to make large chunks of the park inaccessible to the public, ostensibly to preserve bird species, was formulated without proper public input.

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But dog owners and others were shocked to find that the GGNRA had altered its closure plan significantly, and that the agency now intends to close 12 acres of the park, rather than the 10 acres previously identified for closure.

It's no surprise that the GGNRA is playing fast and loose with the concept of public input — the federal agency has a long history of being less than open with the residents to whom it is supposed to be accountable.

Combined with previous closures, the GGNRA's new plan would make more than half of Fort Funston inaccessible.

What's more unusual is that neighbors who thought they had gained a hard-won victory now find themselves faced with the prospect of an even less acceptable set of circumstances. Not only does the agency plan to close 12 acres, it plans to institute the closure permanently, not seasonally.

Combined with previous closures, the new plan would make more than half of Fort Funston inaccessible to the public.

We're sensitive to the GGNRA's responsibility to protect wildlife at Fort Funston, and their emphasis on that point is to be commended — although there is much debate over whether the closure policy will really help the birds.

What is not commendable is the way the agency repeatedly runs roughshod over the concerns of park users. We urge the GGNRA to do a better job of listening to the members of the public that fund its operations with their tax dollars.

SAN FRANCISCO INDEPENDENT Aug 19, 2000 Pg 6A

JANUARY 2, 2001

THE INDEPENDENT

INION

Letters

Fort Funston closure a good idea

Your article about the decision to close off 12 acres of Fort Funston to off-leash dogs ("Fort Funston puts visitors on short leash," December 23) gives the impression that all of the users of Fort Funston are dog owners who want open access to the entire area. This is not true. Many of us who value Fort Funston are not opposed to sensible rules for preserving the natural environment of the dunes and beach.

The preservation of native plants and endangered birds makes the entire beach area more beautiful for all of us. The areas that have been restored to native plants are much more alive than they used to be. Birds and butterflies have returned to the area. The whole area is more inviting and enjoyable because of the change. The bank swallows are an important part of that environment. Having a few acres of a large park closed to dogs and pedestrians is a small price to pay for the increased beauty.

Fort Funston is supposed to be a recreational area for all users, not just for dog owners. While I understand the desire of some people to let their dogs run free, they must know that their freedom can hurt other creatures and people. It has become impossible for me to go to Fort Funston with my niece and her two young boys because the unleashed — and often uncontrolled — dogs are frightening to young children.

We need to work together to keep the park accessible to all of the people who want to use it, and must not allow it to be taken over by one special-interest group like the dog walkers.

ADELE FASICK

Office space might be available

With regard to your recent story concerning the city's need for affordable office space ("Now City Hall feels rent pinch," December 19), when I was working for the city and county of San Francisco in the 1950s, the Public Welfare Department had an office at 150 Otis Street. The building appears to be vacant now.

While it is not directly in the Civic Center area, 150 Otis is near it. It is close to public transit and has some parking available. It would be interesting to find out whether this space might reduce the need for rental offices.

FOSTER JONES

Will Willie resign?

Will Willie L. Brown Jr. resign as mayor in 2001?

The December 2000 runoff for district supervisors was an indication of how low Willie Brown's popularity has plummeted. With no district supervisors in his pocket, Brown will become a true lame-duck mayor who will fail to pass any legislation to begin to solve problems involving homelessness, the lack of affordable housing, public transit, and so on.

I predict that Mayor Brown will resign from office sometime in 2001.

The Committee to Recall Willie Brown will resubmit an updated recall petition in January and will begin gathering voter signatures over a five-month period to qualify the recall for the November general election. The recall effort, whether it succeeds or fails, will keep pressure on the mayor to do his job or face being fired by the voters.

With a Republican president and John Ashcroft as attorney general, the FBI and the Justice Department may step up their investigations of corruption in San Francisco government and Brown may make a final backroom deal to step down to avoid prosecution. I can see him savi face by saying that he will step down to take a lea stressful, higher-paying job that better utilizes l fund-raising and deal-making skills.

The person elected to be the new president of Board of Supervisors will become mayor if Bro resigns.

Every concerned San Franciscan should cal write their district supervisor today and ask t supervisor to elect the board president that h she believes is most qualified to work with board and govern our diverse city as mayor.

For more information on the recall or co information for all supervisors, visit our We at www.RecallBrown.com or call 661-3600.

JI

FOFUAR01576

... to the editor:

FORT FUNSTON: Off-leash dogs

continued from page 1C

Bartke noted, however, that such a rewrite may be a long time coming.

"There's no money in this budget or the next budget or the next budget to do that kind of a plan," he said.

Demanding public hearings

Dog owner's groups have long suggested that the GGNRA has endeavored to keep them out of discussions on Fort Funston closures, one group going so far as to file suit last March against the NPS and GGNRA to force the agencies to hold public hearings on the matter.

Ann Farrow of the Fort Funston Dog Walkers, one of the groups that filed the suit, said that dog walkers suspect that the reduction of their off-leash play space to a fenced on-leash path is the first effort to eradicate all off-leash areas from Fort Funston.

"If we have to be on a leash on those 12 acres, you have to wonder if this is a creeping thing," she said.

Farrow said she believes the revocation of the 1979 Pet Policy, which conflicts with NPS regulations on dog use, was not so much an effort to make local policy comply with national regulations as a punitive measure against dog walkers who fought the closure.

"This is crazy. They can't just get rid of the pet policy, it was created with public hearings, and you can't just toss it out in one meeting, she said.

"I think this is punishment for us taking them to court," said Noe Valley resident Renee Pittin, who frequently takes her black Labrador retriever, Rosie, to Fort Funston.

The city of San Francisco, too, may soon be in court over the matter. Supervisor Leland Yee, in two City Hall hearings in recent months, has intimated that the city may take legal recourse to take back Fort Funston if the fences go up.

In November 1973, San Francisco voters approved transfer of Fort Funston from the city to the GGNRA. The area's deed to the agency, written two years later, includes language that it must be maintained for the "recreational and park use" of visitors.

Last month, supervisors unanimously agreed to order City Attorney Louise Renne to look into the closure as a possible violation of the agreement — a violation that could allow the city to take back the fort.

Yee also asked Renne to sent a letter to NPS officials advising them that city ordinances require that plans for any type of construction, including fences, must be approved by the city's Planning Commission.

NEIGHBORHOOD NEWS

S.F. INDEPENDENT
5 DEC. 2000
P-1

Unleashed dogs under attack

Move to enforce leash laws at Fort Funston

By Edith Alderette
NEIGHBORHOOD REPORTER

PHOTO: RORY McNAMARA

Fort Funston, Ocean Beach, and other regions controlled by the Golden Gate National Recreation Area are extremely popular with dog owners who enjoy running their pets without a leash. Now that ability is being threatened by the GGNRA's advisory commission.

It was a one-two punch that off-leash dog enthusiasts weren't prepared for.

Dog walkers and other users of Fort Funston say they weren't too shocked when the Golden Gate National Recreation Area Advisory Commission voted unanimously last week to recommend that park superintendent Brian O'Neill fence off 12 acres of seaside bluffs for the protection of native wildlife and plant habitat.

But no one was prepared for what followed.

Immediately after the vote, Commissioner Amy Meyer proposed a surprise resolution that would revoke a 20-year-old policy that allows rangers to look the other way when dogs run free at any GGNRA property.

Though the commission appeared ready to approve the revocation, cooler heads prevailed, as commission chair Rich Bartke noted the matter had not been listed on the commission's agenda and moved the matter for hearing at the council's January meeting.

If approved, the revocation of the GGNRA's 1979 Pet Policy would require rangers to cite off-leash dog walkers at 20-odd GGNRA recreational and park areas, including Fort Funston, Ocean Beach, Land's End, Crissy Field, portions of the Presidio, and various other properties in Marin and San Mateo counties.

Acrimonious battles

The recommendation for Fort Funston's closure comes after more than a year of acrimonious protests and court battles to keep the GGNRA and its parent organization, the National Park Service, from adding the bluffs and several coastal trails to the 32 acres already fenced off from the public at the 220-acre Fort Funston.

Commissioners noted that, despite the 1,100 letters the GGNRA received protesting the closure, members' hands were tied because park service regulations, including a 1988 Management Policies report and the Organic Act of 1916, require that the GGNRA give priority to the preservation of natural resources over public use.

"I've read the long series of regulations and court decisions that bind the National Park Service and this commission," said Commissioner Michael Alexander. "I don't see a lot of wiggle room."

O'Neill told the commission that he, too, was controlled by such policies, and his final decision, due in the next few weeks, would have to conform to those guidelines.

"Any policy that we adopt has to be within the purview of the laws and regulations that we are required to carry out," he told the commission.

In an effort to appease the 750,000 annual visitors to Fort Funston — the majority of whom take dogs out for long runs on the beach — the recommendation includes a provision for a fenced trail in the closure area, where owners can walk their dogs on a six-foot or shorter leash.

Some commissioners noted discomfort at being held to regulations that reflect 20-year-old usage patterns and suggested that the NPS consult with user groups and neighbors to rewrite them.

"[A new plan] should reflect not only conservation but how people fit in with that plan," said Commissioner Redmond Kernan. "One could fence off the entire park for conservation."

See **FORT FUNSTON,** *page 6C*

S.F. Independent 5 DEC. 2000 P-1

Dogged Graveyard Debate

Maine canine owners say animals help, not hurt dilapidated site

By Ann S. Kim
ASSOCIATED PRESS

PORTLAND, Maine – Western Cemetery overlooks Portland Harbor in the city's most exclusive neighborhood. But this lovely spot has plainly gone to the dogs.

Poodles and pointers, terriers and retrievers, mastiffs and Great Danes romp over grave sites chasing sticks and balls and each other. Rolls of plastic bags and a list of rules at the entrances remind owners of their responsibilities. On their way out, visitors can drop the bags in a garbage can that sits over the remains of Sally, whose worn marble headstone reveals that she died in 1853 but no longer shows her surname.

Dog owners insist that the previously neglected graveyard is better off – they've organized cleanup days, raised money for restoration and, they say, driven off unsavory elements with their activities.

But they fear they may be pushed out by people who believe the 170-year-old cemetery has been desecrated. A citizens committee is working on a master plan for Western Cemetery. Dogs are not the only item under study, but they are the most contentious.

In cities from California to New York and Alaska to Hawaii, dog owners are fighting for off-leash areas where their pets can run free. They're organizing advocacy groups, putting up Web sites and packing public hearings. In San Francisco, disagreements about the threat of free-running dogs to native vegetation and a nesting area along the city's coastal bluffs have prompted a lawsuit and calls for a congressional investigation.

Such disputes are not new, but they've heated up in the past five years as more people compete for open space, according to Claudia Kawczynska, editor of the "The Bark," a Berkeley magazine that proudly proclaims its roots in "off-leash activism."

"I think a cemetery is a wonderful place, actually, because it honors what has come before, and there's no better way to honor what's come before than with the joy that dogs give," Kawczynska says. "I could think of nothing better than to be greeted at the beginning of the day (by a dog) smelling my remains, just being with me somehow."

Located in a densely populated section of Portland, the cemetery has become an increasingly popular spot to run dogs off their leashes. Owners arrive each morning, coffee mugs and coiled leashes in hand.

A chain-link fence around the 22 acres keeps pets from running into traffic, and the grounds feel open – not spooky like some of the wooded areas in the city where dogs are also allowed off-leash.

But no matter how well-behaved the dogs or how happy they look, some people argue that dogs don't belong in a cemetery – even when their owners use the plastic "Mutt Mitts" to pick up after them.

"Let's put it this way: You could have a law that would say it's OK if you stab people, as long as you pull the knife out and clean up the mess," says Paul O'Neil, president of the local chapter of the Ancient Order of the Hibernians, an Irish Catholic fraternal group. "As far as we're concerned, the harm is already done."

Western Cemetery was the city's primary burial ground through the mid-19th century. Today, many of the white marble headstones lean or have fallen over. Some are broken. Others are illegible, worn down by the elements or covered in lichen.

David Eaton, president of the Friends of Western Cemetery, says the graveyard had become a magnet for drinking, drugs and other illicit activities before the dog owners moved in.

While Police Chief Michael Chitwood says his officers never considered the cemetery a trouble spot, he acknowledges isolated incidents of vandalism, teen drinking and sex over the years.

Anne Pringle, a member of the master plan committee, insists the cemetery is in worse shape now and can't handle all the dogs that use it. She notes that heavy foot and paw traffic has carved a trail over an area of unmarked graves and eroded other paths. Pringle thinks the cemetery should bar off-leash dogs.

Eaton counters that dog owners are willing to compromise, perhaps limiting the hours when dogs can roam. But since the idea is to give dogs vigorous exercise, he says it doesn't make sense to require them to stay leashed or on the paths, and he suggests people put fences around grave sites if they want the dogs to stay off.

Eaton and Pringle agree the city needs more fenced-in and off-leash dog runs, but for many dog owners, nothing competes with Western Cemetery's convenience, beauty and friendly atmosphere.

Chuck Allen has been bringing his boxer, Bettis, to the cemetery for the two years he's lived in Portland.

"This is the only place I come," he says. "I love it."

hese missiles have been stored outside the continental United States.

The Air Force also plans to ockpile other new precision-ded weapons on Guam and ewhere. These include Joint Direct Attack Munitions that B-2 stealth bombers can launch, as well as Joint Standoff Weapons that B-1 bombers are being readied to use in the future.

Besides Guam, the Air Force has in mind three other "forward operating locations": Diego Garcia, a British-controlled island in the central Indian Ocean; the British air base Fairford, 65 miles west of London; and a Middle East location that the Air Force will not identify publicly but which Ryan said "we're looking at" for what he termed "other capabilities."

The idea is to enable bombers, in a short-notice crisis, to fly from their home bases in the United States, attack their targets and then proceed to Guam or another "forward operating location" to reload and return to combat. This gives them a quick restrike capability they now lack, Ryan said. It also would reduce, though not eliminate, the need for midair refuelings.

Although the B-2s are said to have performed as well as or better than expected in the Kosovo campaign, their contribution could have been greater if they were not forced to fly all the way from Missouri.

"That was not our preferred way of operating," Ryan said.

B-2s have never flown combat missions from an overseas base. That is mainly because the special material on the bombers' skin that makes them hard to detect on radar must be repaired in climate-controlled conditions. Harsh weather conditions do not prevent the B-2s from performing their mission, but the regular upkeep required to keep the planes stealthy cannot be done as effectively in regular aircraft hangars.

One solution is setting up special hangars at Fairford, Diego Garcia and Guam to shelter B-2s. The Air Force has contracted with American Spaceframes Fabricators Inc. of Crystal River, Fla., to build a 125-foot long B-2 shelter with aluminum trusses, sloping walls and the strength to withstand winds of 110 mph. Some of the shelters will have temperature and humidity controls.

Thanksgiving travelers.

With the Air Transport Association predicting a record 2.24 million passengers, airport officials across the nation had prepared for the worst.

"They're all coming back at the same time," said Nancy Castles, spokeswoman for Los Angeles International Airport.

She said 205,000 passengers were expected Sunday, up from the estimated 195,000 to 200,000 on the day a year ago.

In the morning, fog at San Francisco International Airport forced cancellation of 20 flights and delayed others up to 2 hours.

"Considering the weather, we've been very lucky," said Jose Juves, spokesman for the Massachusetts Ports Authority.

It was easy sailing for other travelers despite the threat of cancellations due to labor strife. Mechanics for both United and Northwest Airlines, which also had some delays and cancellations, are seeking new labor contracts.

United Airlines said there had been 66 cancellations – 49 of them related to maintenance – out of 2,300 flights systemwide.

No major delays were reported at airports in Miami, Atlanta and Seattle.

Dog lovers, environmentalists clash over recreation area

Panel to opine on whether to close popular section of Fort Funston to public

By Edith Alderette
Of the Examiner

It's a hot-button issue that has environmentalists and pet lovers jumping fences. Should part of the Golden Gate National Recreation Area be used as a park, or closed to the public to protect the natural habitat?

On Tuesday, the GGNRA's advisory commission will offer its opinion on whether 12 acres of scenic Fort Funston bluffs should be closed to the public. It's a matter that may have the city of San Francisco and the federal government clashing in court.

The commission's recommendation will be one factor that GGNRA General Superintendent Brian O'Neill will consider before making his decision on whether to fence the public out.

Park visitors – particularly dog owners – are howling mad and say the closure would worsen the already crowded conditions in the city's few off-leash dog areas.

Several city officials – most notably supervisors Mabel Teng and Leland Yee – are also unhappy at the proposed closure.

The city gave Fort Funston to the National Park Service in 1975. While the city has no control over the federal agency's actions, Yee asked the city attorney last month to investigate whether a clause in Fort Funston's deed could be used to regain control of the land if O'Neill approves closure. In September, Teng requested that federal representatives, including Sen. Dianne Feinstein and Rep. Nancy Pelosi, look into whether this and other closures at the 222-acre park in the southwest corner of the city have been appropriate.

From 1991 to 1995, the GGNRA fenced off 36 acres of Fort Funston's most frequently used areas and tore up a paved trail popular with disabled visitors. All the closures were made without any public input and most were done with the promise that closed areas eventually would be reopened.

To date, no fence has been removed.

In February, the GGNRA and its parent agency, the National Park Service, closed an additional 10 acres of bluffs. Two months later, they were ordered to reopen the area by a federal judge who found that the agencies had failed to obtain necessary public input.

Shortly thereafter, the GGNRA filed a formal request, drafted to include a period for public testimony, to permanently close the initial 10-acre parcel plus an additional 2 acres, saying it was needed to protect wildlife and restore native-plant habitat.

During the public-testimony period ending last month, the GGNRA received 1,500 statements. Park officials say those opinions have been reviewed by the advisory commission and will be considered as part of Tue day's decision.

One dog advocate says the commission would do well to also review a report critical of the closures, produced on behalf of local dog owners to support their contention that the GGNRA didn't have valid scientific reasons for all its actions.

"I'm just hoping they not only read the letters but also all the research that was done that backed up our position," said Anne Farrow of Fort Funston Dog Walkers.

A GGNRA spokesman said members of the commission have studied background materials on the closures.

"They've had access to the public comment, and as individuals they have gone through the past paperwork as far as what we've done with the closure," said GGNRA public-affairs officer Rich Weideman.

He added that the commission's recommendation is nonbinding and O'Neill's word will be final.

"The superintendent takes the recommendation seriously, but ... the mission of the Park Service is the overriding rule in the matter," he said.

O'Neill's decision is expected within the next few weeks.

Tuesday's meeting will begin at 7:30 p.m. at the GGNRA Park Headquarters, Fort Mason Building 201.

On the Net:

Golden Gate National Recreation Area, www.nps.gov/goga/index.htm

San Francisco Dog Owners Group, www.sfdog.org

FOFUAR01580

SF EXAMINER 11-27-00 A2

GGNRA007755

Fort Funston Plan Would Leash Dogs
Tentative deal leaves 1 paved trail open

Wednesday, November 29, 2000
San Francisco Chronicle
CHRONICLE SECTIONS

Chronicle Staff Writers

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San Francisco -- The scenic bluffs of San Francisco's Fort Funston should remain open to leashed dogs and hikers provided they stay on a paved trail, a park advisory group recommended last night.

The compromise was unanimously endorsed by the 18-member Golden Gate National Recreation Area Advisory Commission but still requires approval from

GGNRA Superintendent Brian O'Neill. He is expected to issue a final decision early next month.

If approved, the deal could end a bitter fight over the fate of 12 acres of spectacular oceanfront cliffs dotting the edge of the 230-acre park on the southwest corner of the city.

The Park Service wants the land fenced off to protect native vegetation as well as the threatened bank swallows that nest under the cliffs' sandy banks. Hikers and dog walkers oppose the idea, calling it unnecessary and arbitrary.

It may be a Pyrrhic victory. Minutes after endorsing the compromise, the commission received, then tabled, a proposal by commission vice chair Amy Meyer to end a 21-year-old policy allowing dogs unfettered access to many parts of GGNRA, including Ocean Beach, Crissy Field and Baker Beach. Meyer oversaw the drafting of that original policy.

Meyer's proposal last night could not be considered because it was not on the agenda but

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could be discussed at the commission's January meeting.

Although commissioners agreed that closing 12 acres atop Fort Funston was "appropriate and necessary" to protect wildlife, they called on O'Neill to remove the fences surrounding the land and offer a trail for hikers and leashed dogs to enjoy.

The suggestion to tear down the fences drew smiles of surprise and nudges from dog owners who expected the area to be sealed off.

"(Meyer) said 'Take down the fence.' That's what we've been waiting for," said Anne Farrow, who walks her poodle Keli through the park each day. "This may be a reasonable compromise."

Commissioners agreed on the need to protect the park, but several said conservation must be tempered with the public's right to enjoy the park.

"Just emphasizing the conservation doesn't show how people fit in," said commissioner Redmond Kernan. "One could fence off the entire park for conservation."

He noted that conservation efforts are appropriate in a park like Yosemite National Park, but "urban parks are different."

About a hundred people, most of them dog lovers, packed the advisory commission's standing-room-only meeting.

The closure plan has drawn fire since the GGNRA began fencing off portions of the site in March, and the fight against it has been waged in the courts and at City Hall.

Last month, Supervisor Leland Yee summoned GGNRA officials to a hearing to defend their plan. The 1975 deed that transferred ownership of the land from the city to the park service requires that it be used for recreation or park purposes, and Yee and other supervisors worried the Park Service is limiting access to scarce open space.

But City Attorney Louise Renne noted in a report to the supervisors that the GGNRA has the right to close portions of Fort Funston to protect natural resources. The city, however, could sue on the basis that the closures were "arbitrary or capricious," meaning there is not a rational basis for the closure, according to Renne.

Further clouding the issue is a report by the San Francisco Society for the Prevention of Cruelty to Animals that blamed the GGNRA -- and not the dogs that frequent the park -- for destroying the birds' habitat by fencing off increasingly large areas of the park and removing the non-native ice plant.

The GGNRA insists there is ample evidence showing dogs and hikers are at least partially responsible for the decline in the bird population and the destruction of swallow habitat at the park.

E-mail Chuck Squatriglia at csquatriglia@sfchronicle.com and Marianne Costantinou at mcostantinou@sfchronicle.com.

Fort Funston Forum Wednesday, November 29, 2000 Clean-Up Sat!

Table of Contents *News, opinions, announcements, documents and images about Fort Funston.* e-mail editor

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There has been much confusion about the Advisory Commission's "*recommendation*", which it seems may just be a rubber stamp for a planned management action. It appears that the plan would be this:

The fences come down, and dogs are banned from the 12 acres, except for one trail (not sure where this would run), and they must be leashed on that trail.

Advisory Commission Recommends Approval of Closure Proposal; Stealth Motion to Rescind Pet Policy Ruled Out of Order

The GGNRA's Citizens Advisory Commission last night approved a resolution supporting the closure proposal, after a remarkably brief and cursory discussion of an issue that raised 1500 comments. The next step is for the Superintendent to issue a decision, which is expected in December.

The resolution ended... "Now therefore be it resolved that the decision of the GGNRA Superintendent to close twelve acres of Fort Funston to dogs is appropriate and necessary, and be it further resolved that in preference to permanent closure, the Commission requests the Superintendent consider removing the fences and having a trail through the area accessible to dogs on a leash."

There was no discussion whatsoever of the crux of the issue: the lack of scientific evidence that the closure is needed to accomplish environmental or other concerns. Instead, the whole discussion revolved around *dogs*. The proposal supposedly wasn't about dogs, we were told repeatedly -- this was a closure to everybody. Yet that aspect wasn't even mentioned in the comments.

Further, and quite shockingly, Vice Chair Amy Meyer then went on to introduce a **motion which was not on the agenda** at all: to **rescind the commission's 1979 Pet Policy**. (That policy permitted off-leash recreation in certain areas of the GGNRA in accordance with long-standing practice and the park's enabling legislation).

There was a concerted effort to ramrod this motion through, but thankfully commission member Redmond Kernan pointed out right away that the motion wasn't even on the agenda. Even so, several members went on to opine in favor of voting on it, anyway! One member, Trent Orr, even commented sarcastically that he supposed someone could go to federal court over the motion not having been properly "noticed" -- but that he was in favor of proceeding! A member worried about the legal ramifications of passing such a stealth motion without proper notice. Two audience members spoke as a "point of order" about the lack of notice and opportunity for public comment or opposing legal opinions.

The motion was indeed introduced, but the commission was on notice of the stealth tactic; Bartke ruled it out of order for not being on the agenda.

Park service to fence off Fort Funston acreage to protect threatened birds

By Mike Zapler
Mercury News

A rare bird has moved into a popular recreation area of Fort Funston. And now people and dogs have to move out.

The National Park Service announced Monday it is fencing off a popular dog-walking stretch of Fort Funston in order to protect a threatened California bird, the bank swallow.

The closing of the 12-acre area along the coast will take effect in January, blocking pedestrian and dog access to undesignated trails such as "the Gap" and designated trails including the so-called "Spur Trail."

The idea of closing the trail was hatched more than a year ago, after bank swallows began migrating from northern parts of Fort Funston to southern areas more heavily used by the public. Citizens filed a lawsuit to stop the closing, and a judge mandated that the park service hold a public comment period before it erected fences around the area.

S.J. MERCURY 12/19/2000

About 1,500 people weighed in on the proposed closing, including many from environmental groups and many dog owners.

Although the fences have already been erected, the actual closing won't take place until a notice is printed in the Federal Register in January.

The bank swallows "have moved their nesting area south, and we have an obligation to protect them wherever they choose to nest," park service spokeswoman Christine Powell said.

Most of the environmental problems stem from people and dogs walking on sand dunes along the cliff, where the birds nest. Sometimes they fall over the side and have to be rescued, Powell said. But they also speed up coastal erosion and threaten native plants, she said.

The 220-acre Fort Funston, part of the Golden Gate National Recreation Area, is one of two breeding areas for bank swallows; the other is the Año Nuevo State Reserve, about 55 miles south of San Francisco.

Powell said that the park service is studying the feasibility of building a trail through the closed-off area.

"Dog walking is an important activity in the Golden Gate National Recreation Area," she said, "and we certainly want to find a way to protect resources but still allow this activity to go on."

Contact Mike Zapler at mzapler@sjmercury.com or (415) 394-6875.

SF Chronicle, 12-19 p9 A-25

Dogs, Hikers Losing Access To Funston's Sensitive Bluffs

Park chief overrules committee recommendation

CHRONICLE STAFF REPORT

The bluffs of San Francisco's Fort Funston will be off-limits to hikers and dogs beginning next month, the Golden Gate National Recreation Area announced yesterday.

The decision, by GGNRA Superintendent Brian O'Neill, ends a fight over 12 acres of oceanfront cliffs that dot the edge of the 230-acre park on the southwest corner of the city.

The National Park Service said in July that it wanted to close the area to control erosion, restore native vegetation and protect the threatened bank swallows that roost along the cliffs. Hikers and dog owners, who allowed their pets to romp unleashed through the area, denounced the proposal as San Francisco Supervisor Leland Yee questioned its legality.

Last month, the 18-member Golden Gate National Recreation Area Advisory Commission unanimously recommended allowing hikers and leashed dogs to use established trails in the area.

But O'Neill opted to seal the parcel, which includes the popular Spur Trail and the Gap hiking areas, entirely. His decision is final.

"When there is a conflict between recreation and resource protection, conservation is to be predominant."

BRIAN O'NEILL
Superintendent, Golden Gate National Recreation Area

"We are aware of the GGNRA's recreational mandate, yet (Park Service) regulations clearly state that when there is a conflict between recreation and resource protection, conservation is to be predominant," O'Neill said in a statement.

The Park Service is studying a plan that would allow hikers and leashed dogs to use designated trails within the area once native vegetation has been restored, O'Neill said.

Article last updated:
Wednesday, December 20, 2000 2:55 AM MST

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San Francisco

Dog park to be fenced: The

swallows have kicked the dogs out of Fort Funston.

The National Park Service announced Monday that it will fence off a popular dog-walking stretch of Fort Funston to protect a threatened California bird, the bank swallow.

Most of the environmental problems stem from people and dogs walking where the birds nest. The 12-acre closure won't officially take effect until January.

New trial:

Convicted San Francisco killer John Tennison may get a new trial after the U.S. Court of Appeals questioned the reliability of eyewitness testimony against him.

The ruling rekindles Tennison's challenge to his 1990 murder conviction in which he said he was a victim of mistaken identity.

Tennison is serving 25 years to life at Mule Creek State Prison in Ione for the August 1989 shooting of 18-year-old Roderick Shannon.

Embezzling arraignment:

A spokesman for the San Francisco's District Attorney's Office said one of two woman charged with embezzling more than $62,000 in school district fund-raiser money will be arraigned Friday. District Attorney spokesman Fred Gardner says 21-year-old Edna Tienda was supposed to appear in San Francisco Superior Court Tuesday morning, but was misinformed. Her arraignment has been rescheduled for Friday.

Gilroy

Murder-suicide:

FOFUAR01587

A man shot and killed his female roommate at their Gilroy apartment before killing himself, police said.

Izael Cabrera, 38, argued Monday with two of his female roommates on the front porch of their

MHSC Correspondence

Author: George Su at NP-GOGA-PRES
Date: 10/16/00 11:07 AM
Normal
TO: Roger Scott at NP-GOGASubject: Fort Funston---------- Message Contents

Did I send this one already?

---------- Forward Header ----------
Subject: Fort Funston
Author: "Linda Nicoletto" <lbirdgirl@earthlink.net> at np--internet
Date: 10/8/00 12:38 PM

Dear Sir,
I urge you to please protect the natural resources at Fort Funston and consider the fragility of the Bank Swallow nesting area. Dogs off leash are a major threat to this habitat and we must work to protect it.
I hope the National Park Service works in the interests of the many and not the few dog owners who might not understand the significance of the area.
Thank you for your attention to this matter,
Linda Nicoletto
21 Hickory Ave
Corte Madera, Ca 94925

Author: Roger Scott at NP-GOGA
Date: 12/27/00 7:12 AM
Normal
TO: Mary Gibson ScottSubject: Fort Funston access---------- Message Contents

FYI

_____ Forward Header _____

Subject: Fort Funston access
Author: George Su at NP-GOGA-PRES
Date: 12/21/00 11:35 AM

FYI

_____ Forward Header _____

Subject: Fort Funston access
Author: "Chris Smith" <chrismith@hotmail.com> at np--internet
Date: 12/20/00 6:03 PM

please forward to the office of Brian O'Neill:

Superintendent Brian O'Neill,

I'm writing to express my disappointment over your decision regarding hiking and dog access at Fort Funston.

Fort Funston is an urban park, and includes significant prior development as evidenced by the extensive paved paths and military structures on the cliffs.

I strongly support efforts to restore native plant life, limit erosion and preserve the nesting areas of birds. However, I'm not convinced that the only way to achieve these goals is to close the park to all users. Surely, a compromise allowing access to paved trails for leashed dogs and humans, and preserving the sand ladder access to the beach, will allow preservation and allow San Francisco Residents and their dogs to continue to enjoy this natural treasure.

Sincerely,

Chris Smith
774 Joost Ave.

San Francisco, CA 94127

Author: Roger Scott at NP-GOGA
Date: 12/28/00 1:51 PM
Normal

TO: Mary Gibson ScottSubject: FW: Dogs in San Francisco---------- Message Contents

FYI

Forward Header

Subject: FW: Dogs in San Francisco
Author: "Leader; Mary" <MLeader@presidiotrust.gov> at np--internet
Date: 12/28/00 10:18 AM

Please look at this message that was forwarded to me. I have not responded.

-----Original Message-----
From: Gomez, September
Sent: Tuesday, December 26, 2000 7:28 AM
To: Leader, Mary
Subject: FW: Dogs in San Francisco

-----Original Message-----
From: Denise Jasper [mailto:denise@jasperdog.com]
Sent: Thursday, December 21, 2000 10:13 AM
To: presidio@presidiotrust.gov
Subject: Dogs in San Francisco

There is a rumor going around that the GGNRA now wants to close Fort Funston, Fort Mason, and the back road behind Mountain Lake Park in the Presidio to dogs.

This is extremely disturbing to me.
When the GGNRA took over the Presidio they PROMISED all of us dog owners (and walkers) in the city that they would not change what we have all been doing with our dog friends. We've been going to these places without problems for DECADES!

Conservation is a great cause, but it's place is in the wilderness.

This is a city. Full of concrete, people and their pets. This is not the place for conservation.

I urge you to not try to stop us from taking our dogs to the places mentioned above.
You will find more opposition and demonstrations than you ever thought possible.

Denise Jasper

- Memorandum -

To: GGNRA Citizens Advisory Commission Members

From: Roger Scott

Subject: Information from Lydia Boesch and the Fort Funston Dog Walkers

Commission Members,

Lydia Boesch, a member of the Fort Funston Dog Walkers and an attorney affiliated with the Fort Funston Dog Walkers' suit against the park, dropped these packages off to Public Affairs on September 20, and asked that we forward them to the GGNRA Advisory Commission Members. She explained they were a summary of their presentation from the September 29 Commission Meeting. I said I would be happy to pass them on.

Roger Scott

Author: George Su at NP-GOGA-PRES
Date: 12/1/00 11:31 AM

Forward Header

Subject: Fort Funston
Author: Craig Wiesner <craig@wkmn.com> at np--internet
Date: 11/30/00 2:13 PM

Dear Mr. Su,

One of the great pleasures we have in life is walking our dog at Fort Funston every morning. Although there has been a lot of controversy over each area that has been closed to dogs over the years, I have never become as angry as I am now that I have read a report about Tuesday night's meeting of the GGNRA. It is my understanding that at that meeting, in addition to closing more of the park, one of the representatives tried to move a motion that off-leash walking privileges be rescinded completely. If not for an objection raised over that motion not being on the agenda, the motion might well have passed.

After reading all that I can about the situation at Fort Funston, I have come to the personal conclusion that the park has been terribly mismanaged for these last few years. Removing the ice plant has caused horrible erosion. Putting up fences has only caused the migrating birds to go to areas that are not fenced off. There is less space for people and dogs and more space just being wasted.

This situation must be rectified.

Today, I have written to Mayor Brown, Senators Boxer and Feinstein, Representative Lantos, Secretary Babbitt, and my representatives in the California Assembly and Senate. If it is your intention to continue closing the park to recreational use, and punish dog walkers for taking legal action against those closures, I am now ready to join the fight in whatever way I have to, to ensure that this San Francisco treasure is not stolen from us.

Please, work with the environmentalists, dog walkers, and other users of this park to come to a compromise that we can all live with.

Respectfully,

Craig Wiesner
29 Mira Vista Court
Daly City, CA 94014

Author: Roger Scott at NP-GOGA
Date: 12/7/00 10:47 AM
Normal
TO: craig@wkmn.com at NP--INTERNETCC: Brian O'NeillCC: Rich WeidemanSubject: Fort Funston---------- Message Contents

To: Craig Wiesner

From: Roger Scott, GGNRA Public Affairs

Subj: Your E-mail on Fort Funston (below)

Dear Mr. Wiesner:

This is in response to your e-mail to the park on December 1, 2000. Thank you for your interest in and comments on Fort Funston. The GGNRA Citizen's Advisory Commission is an advisory body to the park upon to whom we look to provide insight from the communities that surround the park on issues relating to planning and park operations. They do not make policy, however, their advice is weighed by the park when making important decisions.

GGNRA manages Fort Funston and all park sites within its responsibility to meet the mission of the National Park Service which is to:

> "conserve and protect the scenery and the natural and historic objects and wild life therein and to provide for the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations

The above management policy and subsequent directives from the NPS director dictate that the National Park Service must manage its resources in such a way that they are preserved for future generations and that recreational activities that take on National Park land do not have a detrimental effect on those resources.

We do not see our proposed closure as a punitive action against dog walkers, but as a balance between all user groups that carries out our legally mandated management policies. The Enabling Legislation of GGNRA specifically says that ..."the Secretary shall preserve the recreation area as far as possible in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area."

While you may not agree with the Advisory Commission's recommendations decisions, I assure you we are interested in working with environmental organizations and all user groups who enjoy Fort Funston as well as other parts of the GGNRA.

Roger Scott
Public Affairs

___ Subject: Fort Funston

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

December 15, 2000

From: Roger Scott/Chris Powell
GGNRA Public Affairs

To: Congressional Representatives

Subj: GGNRA Decision Document regarding 12-acre Closure at Fort Funston for Habitat Protection and Public Safety

Dear Congressional Representative:

In order to keep your office appraised of ongoing issues at Golden Gate National Recreation Area, we wanted to inform you that we have reached a decision regarding the Fort Funston 12-acre habitat protection closure.

The package includes a copy of a press release, the signed decision document and seven attachments that relate to the closure. As noted in the press release, although the document was official when signed on December 14, no action will take place at Fort Funston until after the notice appears in the Federal Register in January. We will contact you prior to the actual closure of the area.

Please call either Rich Weideman, (415) 561-4730; Roger Scott, (415) 561-4731; or Chris Powell (415) 561-4732 if you have questions regarding the material.

December, 15, 2000

From: Roger Scott/Chris Powell
GGNRA Public Affairs

To: GGNRA Citizens Advisory Commissioners

Subj: GGNRA Decision Document regarding 12-acre Closure at Fort Funston for Habitat Protection and Public Safety

Dear Commissioner:

In order to keep you appraised of ongoing issues at Golden Gate National Recreation Area, we wanted to inform you that we have reached a decision regarding the Fort Funston 12-acre habitat protection closure.

The package includes a copy of a press release, the signed decision document and seven attachments that relate to the closure. As noted in the press release, although the document was official when signed on December 14, no action will take place at Fort Funston until after the notice appears in the Federal Register in January. We will contact you prior to the actual closure of the area.

Please call either Rich Weideman, (415) 561-4730; Roger Scott, (415) 561-4731; or Chris Powell (415) 561-4732 if you have questions regarding the material.

January 12, 2001

Julie Christenson
1902 Steiner Street #C
San Francisco CA 94115

Dear Ms Christenson:

Please find enclosed the three documents you requested.

1. the Citizen Advisory Commission's 1979 pet policy
2. 36 CFR 2.15, the NPS policy regarding pets
3. Documents relating to the transfer of Fort Funston from the City of San Francisco to the National Park Service.

If you have further questions, please contact myself (415) 561-4731 or Rich Weideman at (415) 561-4730.

Regards,

Roger Scott

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

August 2, 2000

Dear Senator/Congresswoman:

In an effort to keep you and your staff informed on subjects relating to the Golden Gate National Recreation Area, please find enclosed a Notice for Public Comment and a project description for a proposed closure at Fort Funston. This is being sent to both your local and Washington D.C. offices. If you have any questions on this project please call Mary Scott, Assistant Superintendent for Operations at 561-4720.

Sincerely,

Roger Scott
Public Affairs

FOFUAR01600

GGNRA007775

United States Department of the Interior

NATIONAL PARK SERVICE
Golden Gate National Recreation Area
Fort Mason, San Francisco, California 94123

IN REPLY REFER TO:

November 30,2000

To: Carolyn Bartholomew,
Chief of Staff for Congresswoman Pelosi

From: Roger Scott, Public Affairs, GGNRA

Subject: Advisory Commission Action on Fort Funston

Ms Bartholomew:

The attached resolution was passed at the November 28 Golden Gate NRA Citizens Advisory Commission Meeting at Fort Mason. It references the park's proposed plan to close 12 acres at Fort Funston for Bank Swallow protection, erosion control, habitat restoration and public safety.

The commission voted unanimously in support of the closure and offered some suggestions regarding possible alternatives for dog walking in the closed area. Their resolution was passed only as advice to help the park make its final decision on the closure.

The final decision on the Fort Funston closure will be made by General Superintendent Brian O'Neill in early December. The park plans to keep the Congresswoman and her staff informed on this issue and will let you know as soon as a final decision is made.

If you have any questions on this issue, please contact me at 9415) 561-4731.

Regards,

Roger Scott

FCT Fusion Don Deal

FOFUAR01602

LETTERS TO THE EDITOR 1-6-01

Fort Funston Closures Are Anti-People

Editor – Radical changes are imminent at Fort Funston. I would encourage all Bay Area citizens to visit this beautiful local park as soon as possible.

Management of the Golden Gate National Recreation Area has announced its intention to permanently close an additional 12 acres of Fort Funston this month, and to close the rest of the park to all off-trail access within a short amount of time. A substantial portion has already been fenced off in the past few years.

The park managers are doing this unilaterally, arrogantly and arbitrarily, ignoring the protests of many of the thousands of park users and in spite of an agreement made with San Francisco years ago when we turned management of the park over to the federal agency. The agreement then was to manage Fort Funston for the use and recreation of the citizens of the Bay Area.

The park management clearly feels it can brush aside any public opinion and must answer to no one, least of all the users.

Visit Fort Funston while it is still in a semblance of its original state and before the National Park Service unit turns this irreplaceable urban asset into an inaccessible nature preserve. Make no mistake about it: The agency is only using the dog-walking issue as an excuse. Fundamentally, it is anti-people.

JIM and CAROLE KROTZER
San Francisco

M. Scott
Cy. B.O'Neill
R. Weideman
C. Powell
R. Scott
N. Wakehall
D. Mannel
J. Ruan
R. Borges
H. Levitt
G. Merkle
D. Hatch

A20 1/10/01

Preserve Fort Funston

Editor – Regarding a letter to the editor (Jan. 6) about a decision to close off 12 acres of Fort Funston to off-leash dogs: Many of us who value Fort Funston as a recreational area are in complete agreement with the National Park Service's sensible rules for preserving the natural environment of the dunes and beach.

The area that has been closed off is only about 5 percent of the 230 acres that make up Fort Funston. The preservation of native plants and endangered birds makes the entire beach area more beautiful for all of us.

The areas that have been restored to native plants are much more alive than they used to be. The birds have returned as well as butterflies and other insects. The whole area is more inviting and enjoyable because of the change.

The bank swallows are an important part of that environment. Having a few acres of a large park closed to dogs and pedestrians is a small price to pay for the increased beauty.

Fort Funston is supposed to be a recreational area for all users, not just for dog owners. While I understand the desire of some people to let their dogs run free, they must know that their freedom can hurt other creatures and people.

It has become impossible for me to go to Fort Funston with my niece and her two young boys because the unleashed and often uncontrolled dogs are frightening to young children. We need to work together to keep the park accessible to all of the people in the Bay Area who enjoy this unique natural location.

ADELE FASICK
San Francisco

FOFUAR01604

GGNRA007779

B. O'Neill
Cy: M. Scott
N. Wakefield
R. Wasserman
R. Scott

January 4, 2001

Brian O'Neill
General Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123

Dear Mr. O'Neill,

I am writing regarding the proposed resolution to ban all off-leash dog recreation at Crissy Field, Baker Beach, Ocean Beach and Fort Funston. I am thoroughly opposed to this proposed ban. This is a recreation area. People go there with their dogs. These areas are located in the middle of a big city. It is unreasonable to apply rules created for areas such as Yosemite and the Grand Canyon to a "national park" in a densely populated city. Bay Area residents have been coming to these areas with their dogs for as long as people have been using them. There are no significant problems associated with off-leash dogs. Why should this change?

Sincerely,

Anne Junius A D Junius

Anne and Andrew Junius
77 Aquavista Way
San Francisco, CA 94131

Cc: Richard Bartke

ALICE WILEY & ASSOCIATES

B. O'Neill
Cy: M. Scott
N. Wakefield
R. Weideman
R. Scott

January 5, 2001

Mr. Brian O'Neill
General Superintendent
Golden Gate National Recreation Area
Fort Mason, Bldg. 201
SF, CA. 94123

Dear Mr. O'Neill,

We feel very strongly that dogs should be allowed to be off-leash at Crissy Field, Baker Beach, Ocean Beach and Fort Funston.

Dogs are an important part of people's lives. They are friends and helpmates of the elderly, the sick (especially children), the disabled, and people from all walks of life. They add joy and love to our lives with their unconditional love and charming ways. The walking and running that takes place at Crissy Field, as well as the other beaches and park areas, is therapy for dog owners and essential for the dogs' physical and mental well being. I also have friends who do not have dogs, who feel safer, happier, and more able to enjoy the beaches and parks when dogs and their owners are present. Watching Samantha, our black labrador, run on the beach and swim freely in the ocean means a lot to us.

In addition, we, as well as many of our friends, have contributed financially to the rebuilding of Crissy Field, with the understanding that our dogs would be allowed to be there off-leash.

Please do not ban off-leash access to the beaches. This is not, and should not, be a federal issue.

Thank you.

Sincerely,

Alice Wiley Hall

Alice Wiley Hall

FOFUAR01606

INTERIOR DESIGN AND RENOVATION

Showplace Square West 550 Fifteenth Street Suite 30 San Francisco, CA 94103 Telphone (415) 861-6700 Fax (415) 861-6727

B. O'Neill
cc: M. Scott
N. Wahlstedt
R. Weissman
R. Scott

General Superintendent
GGNRA Fort Mason
Bldg 201 Franklin & Bay Streets
San Francisco, CA 94123

Re: Fort Funston

Dear Mr. Superintendent:

My wife and I are longtime San Francisco citizens. We walk our dog each weekend at Fort Funston, and we are appalled that the GGNRA is planning to place many acres permanently off limits to all public access—this despite (1) two resolutions by the Board of Supervisors, (2) a letter to the Park Service from the City Attorney's Office, which was ignored, (3) overwhelming opposition to the closure, (4) lack of scientific justification for the closure, and (5) assurances by the Park Service in 1995 that there would be no more closures.

I have already written the Mayor and the Board of Supervisors, but I wanted to write you for the following reason: you and the GGNRA are alienating your core constituency. We are lifetime Sierra Club members and consider ourselves diehard conservationists. For the first time in our lives, however, we can honestly identify with those in the Republican party who constantly complain about non-responsive public bureaucracies that take away public land without listening to the concerns of those who use that land. The current administration will be quite hostile to the Park Service's environmental agenda and if you alienate those who support you year in and year out, you will one day find yourself without the political base necessary to support the real environmental work that this country so desperately needs.

Please – for the sake of pro-environment politics in the United States – keep Fort Funston free.

Very truly yours.

Jon Kaplan
3025 Castro St.
San Francisco, CA 94131

Author: "Leader; Mary" <MLeader@presidiotrust.gov> at np--internet
Date: 12/28/00 10:18 AM
Normal

TO: Roger Scott at NP-GOGATO: Rich Weideman at NP-GOGA-PRESTO: "Sonenshine; Ron" <RSonensh
ine@presidiotrust.gov> at NP--INTERNETTO: "Cook; Karen" <KCook@presidiotrust.gov> at NP--I
NTERNETTO: "Carey-Grant; Cynthia" <CCarey-Grant@presidiotrust.gov> at NP--INTERNETSubject:
FW: Dogs in San Francisco---------- Message Contents

Please look at this message that was forwarded to me. I have not responded.

-----Original Message-----
From: Gomez, September
Sent: Tuesday, December 26, 2000 7:28 AM
To: Leader, Mary
Subject: FW: Dogs in San Francisco

-----Original Message-----
From: Denise Jasper [mailto:denise@jasperdog.com]
Sent: Thursday, December 21, 2000 10:13 AM
To: presidio@presidiotrust.gov
Subject: Dogs in San Francisco

There is a rumor going around that the GGNRA now wants to close Fort Funston, Fort Mason, and the back road behind Mountain Lake Park in the Presidio to dogs.

This is extremely disturbing to me.
When the GGNRA took over the Presidio they PROMISED all of us dog owners (and walkers) in the city that they would not change what we have all been doing with our dog friends. We've been going to these places without problems for DECADES!

Conservation is a great cause, but it's place is in the wilderness. This is a city. Full of concrete, people and their pets. This is not the place for conservation.

I urge you to not try to stop us from taking our dogs to the places mentioned above.
You will find more opposition and demonstrations than you ever thought possible.

Denise Jasper

Author: George Su at NP-GOGA-PRES
Date: 12/21/00 11:35 AM
Normal

TO: Theresa A. Griggs at NP-GOGATO: Kevin C. Turner at NP-GOGATO: Roger Scott at NP-GOGASu
bject: Fort Funston access---------- Message Contents

FYI

---------- Forward Header ----------
Subject: Fort Funston access
Author: "Chris Smith" <chrismith@hotmail.com> at np--internet
Date: 12/20/00 6:03 PM

please forward to the office of Brian O'Neill:

Superintendent Brian O'Neill,

I'm writing to express my disappointment over your decision regarding hiking and dog access at Fort Funston.

Fort Funston is an urban park, and includes significant prior development as evidenced by the extensive paved paths and military structures on the cliffs.

I strongly support efforts to restore native plant life, limit erosion and preserve the nesting areas of birds. However, I'm not convinced that the only way to achieve these goals is to close the park to all users. Surely, a compromise allowing access to paved trails for leashed dogs and humans, and preserving the sand ladder access to the beach, will allow preservation and allow San Francisco Residents and their dogs to continue to enjoy this natural treasure.

Sincerely,

Chris Smith
774 Joost Ave.
San Francisco, CA 94127

B. O'Neill
Cy: M. Scott
N. Walthall
R. Weideman
R. Scott

RECEIVED
DEC 28 2000
SUPERINTENDENT'S OFFICE

1380 Greenwich St., #203, San Francisco, Ca 94109 775-1812

December 19, 2000

Brian O'Neill, General Superintendent
GGNRA
Fort Mason, Ca. 94123

Dear Brian:

I am so glad you are going to protect the cliff and upper slopes at Fort Funston with sensitive nesting and plant restoration values. As a walker, including occasional dog walker, at Fort Funston, I know that large areas are still available outside the protected area. I would also like to congratulate you on the small preserve around the old Coast Guard Station which can be important for shorebirds and winter migratory birds.

The selfishness of many domestic pet owners is most discouraging. There is a world out there they need to help protect. In this case it is at their feet!

Sincerely yours,

Sue Smith

Sue Smith

B. O'Neill
Cy: M. Scott
N. Walthall
R. Weideman
R. Scott

December 21, 2000
1090 Francisco Street # 14
San Francisco, CA 94109

Mr. Brian O'Neil, General Superintendent
Golden Gate National Recreation Area.
Fort Mason
San Francisco, CA 94123

Dear Mr. O'Neil:

Thank you for closing off part of Fort Funston! I was overjoyed to read this in the "Chronicle" the other day. The area in question is such a SMALL part of the park and beach, that it amazes me anyone should object.

Of course dog walkers believe the rules apply to everybody BUT them. The last time I attempted to walk and bird at Fort Funston, I watched ONE woman unleash NINE dogs on the ridge. This is not unusual.

It is too bad most of the park and beach are "off limit" to people not wanting to step in dog feces or get chased or barked at. I hope GGNRA and/or the National Park Service will be able to enforce the rules of this recent closure. The native plants may have a chance to grow. Bank swallows may continue to nest. A small pocket of land may flourish.

I know what a battle this has been. I just want you to know how deeply appreciated your decision is by many of us. THANK YOU!!

Very truly yours,

Janet Harrison

Janet Harrison

Does the government owe us unlimited access to public lands, lakes and shorelines to recreate as we wish?

This question was raised in a discussion group at the Parks Caucus 2000 and provided an interesting and thought-provoking dialogue. The question is not a new one. At the turn of the last century, the agencies responsible for managing fish and game realized that there was a growing scarcity of many animal species due to excessive hunting and fishing. They implemented not only a license system for these activities for private as well as public lands, but also a larger set of restrictions regarding time of year, location (e.g. only fish upstream from your neighbor) and even method such as use of hook and line for fishing. Imagine the outrage caused by these constraints on private pursuit in the frontier era.

The management of sport hunters in the last century may be the prologue for management of increasingly-limited open space resources in cities of the 21st century. As Dr. Glenn Haas, director of the Federal Interagency Task Force on Visitor Capacity on Public Lands, thoughtfully described in a recent article, the conditions that shaped sport hunting 100 years ago are present today for many outdoor recreation opportunities: increasing demand, competition, scarcity, degradation, depletion, conflict, powerful special interest, judicial challenges and public debate. We have already seen restrictions of recreational activities on state and federal lands for snow mobiles, jet skis, and dirt bikes. Most Americans have come to accept that restraints on their recreational freedoms are the price we pay for sustaining our wildlife resources and the quality of our experiences in the great outdoors.

NEIGHBORHOOD PARK REPORT #19

When the recreational space is the neighborhood park, however, it becomes more difficult to balance the competing demands. While some view a park primarily for the opportunity to experience nature in a tranquil setting, others see it as a play area for their children or as a place to exercise their dog. In San Francisco, competing demands are causing increasing conflicts over uses from frisbee golf to restriction of access for private, fund-raising functions. Without a doubt, however, the most acrimonious debate has emerged around dogs. How did "man's best friend" become the juggernaut for neighborhood acrimony so deep that we have lost even the pretense of civility at public meetings or in interactions with our neighbors in our precious green spaces?

As both an environmentalist and a dog owner, I accept that our city government has to make hard decisions regarding multiple demands for limited space. They also need to manage and protect what is, after all, an environmental resource providing invaluable benefits to everyone. Parks can degrade just like fisheries or air quality. But somehow at the beginning of the 21st century, we are caught again in a frontier-mentality of "my rights" first before public rights. Urban cowboys roam the landscape with sports utility vehicles or jet skis regardless of how much gas is guzzled or how the noise ruins

continued inside

THE NEIGHBORHOOD PARK REPORT
NOVEMBER/DECEMBER 2000

Sharing Space... *continued*

someone else's tranquility. Most disturbing, though, is that our civic dialogue is now modeled on the Jerry Springer show—from confrontation to cat calls and hisses. Surely we can do better.

While there are no easy ways to resolve competing demands on urban parks, we could start by observing a few ground rules:

1) Think about civility before you confront your neighbor, a stranger, or a city staff person. Is this really the way you would like to be addressed? Is there a way to make your point politely, which might even win the other person over to listening to you?

2) Think about the space that you are advocating for. Is it really suitable for multiple uses? Can you truly say that your preferred use is in the largest public interest at that site or should you try to accommodate it somewhere else?

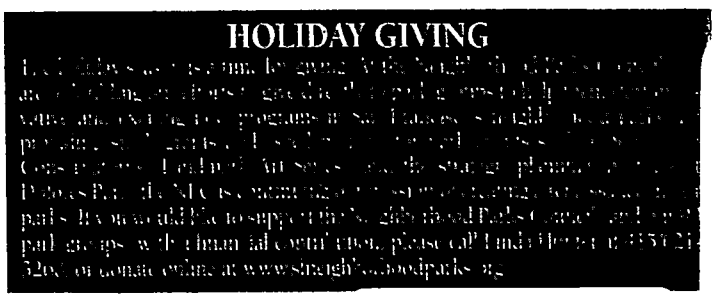
3) Think compromise. While not every park can have multiple uses, some could if people were willing to accommodate other interests, whether in reducing their size or time needs or in containing their needs in order to reduce conflicts.

4) Think about community. Neighborhood parks have such potential to bring people together. Let's try to work together for our common good rather than against each other. Our neighborhoods will thrive, and so will our parks.

As for the city government, they need to bolster their resolve and exercise some leadership to reduce the tensions on use issues. A clear and consistent process is required as well as final decisions that are really final. We can all learn to live with the rules if they have some reasonable rationale and we have plenty of notice for any change from current practice. Ideally, if changes are made, Rec and Park will also attempt to accommodate groups with additional needs at another site or initiate a process to find other sites. The Mayor could help with a citywide campaign to foster civility in our civic dialogue – an exercise that is needed in many corners of San Francisco, especially our parks.

—Isabel Wade, Executive Director

HOLIDAY GIVING



THANK YOU

FOFUAR01612

Joan Benjamin
Cole Hardware
Cowell Foundation
Andrew Brother Elk
Walter and Elise Haas Fund
Sarah Gores, Kaboom! Inc.
Tom Mitchell, Kaboom! Inc.
Friends of Recreation and Parks
Tim Pauline
Mary Crocker Trust
Peet's Coffee
Providian Financial
San Francisco Beautiful
Rhoda Robinson
Warren Hellman
David Bott, Accountant

GGNRA007787

JANUARY 2, 2001

THE INDEPENDENT

INION

Letters

Fort Funston closure a good idea

Your article about the decision to close off 12 acres of Fort Funston to off-leash dogs ("Fort Funston puts visitors on short leash," December 23) gives the impression that all of the users of Fort Funston are dog owners who want open access to the entire area. This is not true. Many of us who value Fort Funston are not opposed to sensible rules for preserving the natural environment of the dunes and beach.

The preservation of native plants and endangered birds makes the entire beach area more beautiful for all of us. The areas that have been restored to native plants are much more alive than they used to be. Birds and butterflies have returned to the area. The whole area is more inviting and enjoyable because of the change. The bank swallows are an important part of that environment. Having a few acres of a large park closed to dogs and pedestrians is a small price to pay for the increased beauty.

Fort Funston is supposed to be a recreational area for all users, not just for dog owners. While I understand the desire of some people to let their dogs run free, they must know that their freedom can hurt other creatures and people. It has become impossible for me to go to Fort Funston with my niece and her two young boys because the unleashed — and often uncontrolled — dogs are frightening to young children.

We need to work together to keep the park accessible to all of the people who want to use it, and must not allow it to be taken over by one special-interest group like the dog walkers.

ADELE FASICK

Office space might be available

With regard to your recent story concerning the city's need for affordable office space ("Now City Hall feels rent pinch," December 19), when I was working for the city and county of San Francisco in the 1950s, the Public Welfare Department had an office at 150 Otis Street. The building appears to be vacant now.

While it is not directly in the Civic Center area, 150 Otis is near it. It is close to public transit and has some parking available. It would be interesting to find out whether this space might reduce the need for rental offices.

FOSTER JONES

Will Willie resign?

Will Willie L. Brown Jr. resign as mayor in 2001?

The December 2000 runoff for district supervisors was an indication of how low Willie Brown's popularity has plummeted. With no district supervisors in his pocket, Brown will become a true lame-duck mayor who will fail to pass any legislation to begin to solve problems involving homelessness, the lack of affordable housing, public transit, and so on.

I predict that Mayor Brown will resign from office sometime in 2001.

The Committee to Recall Willie Brown will resubmit an updated recall petition in January and will begin gathering voter signatures over a five-month period to qualify the recall for the November general election. The recall effort, whether it succeeds or fails, will keep pressure on the mayor to do his job or face being fired by the voters.

With a Republican president and John Ashcroft as attorney general, the FBI and the Justice Department may step up their investigations p corruption in San Francisco government an Brown may make a final backroom deal to st down to avoid prosecution. I can see him savi face by saying that he will step down to take a le stressful, higher-paying job that better utilizes fund-raising and deal-making skills.

The person elected to be the new president of Board of Supervisors will become mayor if Br resigns.

Every concerned San Franciscan should ca write their district supervisor today and ask supervisor to elect the board president that she believes is most qualified to work witl board and govern our diverse city as mayor.

For more information on the recall or c information for all supervisors, visit our We at www.RecallBrown.com or call 661-3600.

JI

FOFUAR01613

GGNRA007798

to the editor:

Keating Wells PK Fusion 1-9-01

FOFUAR01614

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January 10, 2001

Via Facsimile
(415) 436-6748

Mr. Charles M. O'Connor
Assistant United States Attorney
Chief, Environment & Natural Resources Unit
450 Golden Gate Avenue
Post Office Box 36055
San Francisco, California 94102

Re: Ft. Funston Dog Walkers v. Bruce Babbitt
USDC No. C 000 0877 WHA

Dear Mr. O'Connor:

Please be advised that the National Park Service has placed new signs on the fences of the subject closure area at Fort Funston. The signs state that the area will be closed as of January 12, 2001 and that members of the public using the area may be cited.

Please be on notice and make sure that the relevant Park Service employees are aware that any such action would be in contempt of the Court order currently in place in this case.

I enclose another copy of the May 16, 2000 Preliminary Injunction in this case, by which the Federal Court orders that:

> Effective ... defendants are ordered to leave the gate open to the new temporary closure at Fort Funston and, with respect to the new permanent closure, to have installed such gates and leave them open as necessary to allow access to the gap and to the beach via the gap. Otherwise, the fences may remain in place pending a final judgment.
>
> If and when the National Park Service fully complies with the regulation requiring notice and comment, 36 C.F.R.1.5(b), the National Park Service may apply for the Court to modify and/or dissolve this preliminary injunction. If the National Parks Service does not do so, the Court may not be sympathetic to a future

Re: Ft. Funston Dog Walkers v. Bruce Babbitt.
USDC No. C 000 0877 WHA

closure based on an "emergency" when the bank swallows return in April 2001, given that their return is foreseeable and sufficient lead time seems to exist for the National Park Service to address any problems through non-emergency means.

The plain and clear language of the Preliminary Injunction is that the area is to remain open to public access until such time as the government prevails on a motion to modify or dissolve the current injunction. The motion is to be brought on ordinary notice, as there is no "emergency" circumstance and there is harm to the public interest as well as possible environmental downside consequences if the closure occurs without appropriate consideration.

The publicly disclosed documents reflect that Mr. O'Neill's closure decision was signed on December 14, 2000 and issued on December 18, 2000, and therefore the circumstances appear to not conform with the 30 day rule for proper rulemaking. The public is prejudiced by the inadequate notice over the holiday period. Some may seek reconsideration or review of the decision, particularly in light of the perceived improper and inadequate rulemaking, the appearance of lack of reasonable compliance with the environmental review requirements, and the concern that the decision is otherwise in violation of the relevant statutes.

Kindly confirm that the signs threatening unlawful closure and unlawful citation will be promptly removed and that the closure will not occur absent compliance with the Court's Preliminary Injunction Order protecting the public.

Sincerely,

John B. Keating

cc. Laurens Silver
Head Ranger, Fort Funston Ranger Station

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

FT. FUNSTON DOG WALKERS, a membership organization; SFDOG, a California limited partnership; LINDA MCKAY, an individual; FLORENCE SARRETT, an individual; LINDSAY KEFAUVER; an individual; and MARION CARDINAL, an individual,

Plaintiffs,

v.

BRUCE BABBITT, Secretary of the Interior; ROBERT STANTON, Director of the National Park Service; JOHN REYNOLDS, Regional Director, Pacific West Region, National Park Service; and BRIAN O'NEILL, General Superintendent of the Golden Gate National Recreation Area,

Defendants.
_____/

GOLDEN GATE AUDUBON SOCIETY,

Intervener/Defendant.
_____/

No. C 00-00877 WHA

PRELIMINARY INJUNCTION

Based on the Court's findings of fact and conclusions of law dated April 23, 2000, the Court enters the following preliminary injunction against defendants:

Effective upon the end of the pending emergency (declared by the National Park Service upon the April return of the bank swallows), defendants are ordered to leave the gate open to the

new temporary closure at Fort Funston and, with respect to the new permanent closure, to have installed such gates and leave them open as necessary to allow access to the gap and to the beach via the gap. Otherwise, the fences may remain in place pending a final judgment.

If and when the National Park Service fully complies with the regulation requiring notice and comment, 36 C.F.R. 1.5(b), the National Park Service may apply for the Court to modify and/or dissolve this preliminary injunction. If the National Park Service does not do so, the Court may not be sympathetic to a future closure based on an "emergency" when the bank swallows return in April 2001, given that their return is foreseeable and sufficient lead time seems to exist for the National Park Service to address any problems through non-emergency means.

IT IS SO ORDERED.

Dated: May 16, 2000.

WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE

United States District Court
For the Northern District of California

FOFUAR01619

NATURAL RESOURCES SECTION
OF THE
RESOURCES MANAGEMENT PLAN

GOLDEN GATE NATIONAL RECREATION AREA

Prepared

by

Golden Gate National Recreation Area
National Park Service
Department of the Interior

December 20, 1999

Prepared by: The Natural Resources Staff Date: 12/27/99
Division of Natural Resource
Management and Research

Approved by: Mary Gibson Scott Date: 12/27/99
General Superintendent, Golden Gate
National Recreation Area

NATURAL RESOURCES SECTION
OF THE
RESOURCES MANAGEMENT PLAN

GOLDEN GATE NATIONAL RECREATION AREA

Prepared

by

Golden Gate National Recreation Area
National Park Service
Department of the Interior

December 20, 1999

Prepared by: Warren Long for Terri Thomas Date: 12/23/99
Division of Natural Resource
Management and Research

Approved by: Mary Gibson Scott Date: 12/23/99
for General Superintendent, Golden Gate
National Recreation Area

NATURAL RESOURCES SECTION
OF THE RESOURCES MANAGEMENT PLAN

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1 INTRODUCTION

Golden Gate National Recreation Area (GGNRA) was created from a vision to protect and promote the enjoyment of the natural and cultural resources on the edge of the urban San Francisco Bay Area communities. The vast natural resources that existed in the bay estuary and its environs prior to 1800 have been reduced to minute remnants, which are protected in a handful of national, state and local parks and open space. The opportunity exists in GGNRA to preserve the last remnants of what was once an abundant flora and fauna.

This Natural Resources Management Plan documents the extent and condition of and threats to the natural resources of GGNRA, and lays a foundation for actions to preserve and restore, where necessary, the Californian habitats, and ecosystems on which they depend. It is complementary to and consistent with other National Park Service (NPS) and GGNRA management documents.

1.1 Purpose of Park Establishment

The National Park Service Act of 1916 created the NPS:

> ". . . to conserve the scenery and natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

GGNRA is administered by the NPS. One mandate for all national park units is to preserve natural resources values. GGNRA's enabling legislation states that the park was founded:

> "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco possessing outstanding natural, historic, scenic and recreational values . . ."

The act stated that management of the park:

> ". . . shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management."

The act charges the Secretary to:

> ". . . preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area."

1.2 Purpose of the Plan

This Natural Resources Management Plan identifies GGNRA's natural resources and their condition. It describes a program to preserve, monitor, maintain, and restore, where necessary, the natural California habitats, and ecosystems on which they depend. The ever-growing metropolitan population adjacent to these natural areas exerts a great pressure to over-utilize the fragile natural systems that remain. This plan identifies these pressures and provides strategies for protecting the natural systems and resources.

This plan is complementary to and consistent with other NPS and GGNRA management documents including the NPS Policies (1989), Statement for Management (1990), the General Management Plan

(1980), and the Presidio General Management Plan (1994). This plan revises the previous Natural Resources Management Plan (1994) and addenda (1982, 1984, 1987). The existing focused plans (Fire Management Plan, 1986; Water Resources Management Plan, 1991) were written as supplemental components of the 1994 Natural Resources Management Plan. The current plan is also consistent with the goals and objectives of the United Nations Man in the Biosphere program. GGNRA is a member of this program as part of the Central California Coast Biosphere Reserve.

1.3 Compliance/National Environmental Policy Act

Compliance with the National Environmental Policy Act (NEPA) and other resource protection legislation is not accomplished through the Natural Resources Management Plan. Each Project Statement includes a section on the need for compliance, or indicates whether a project is categorically excluded from the NEPA process. NPS guidelines for Resources Management Plans require that environmental compliance be undertaken when funding is likely. Environmental documents for appropriate projects will be completed prior to any irreversible or irretrievable commitment of funds or efforts to a particular course of action, beyond planning.

2 NATURAL RESOURCES VALUES

2.1 Geography, Geology and Minerals

GGNRA comprises approximately 75,000 acres of coastal lands in the San Francisco Bay Area. This long, narrow park is divided by the Golden Gate entrance to San Francisco Bay, which separates the northern Marin County lands from the southern San Francisco and San Mateo county lands.

The topographical relief of the park ranges from sea level to 2,300 feet above mean sea level near the top of Mt. Tamalpais. Hillslopes range from almost flat marine terraces and alluvial deposits to steep canyons along some creeks, and near vertical bluffs above some beaches. Most watersheds are less than one square mile in area, and flow through narrow V-shaped stream beds cut through bedrock. Stream channel gradients range from 3 percent, in Elk Creek, to 35 percent, in steep tributaries on Bolinas Ridge.

GGNRA is located in a seismically active zone. The San Andreas Fault extends northwest from near Fort Funston, and runs through Bolinas Lagoon and Tomales Bay. The San Andreas is the major fault in the area, but many smaller faults also exist. Movement on the San Andreas continues at an average of about 1 to 2 centimeters per year. This movement is expressed as a violent earthquake occurring about once a century. Many earthquakes of lesser magnitude occur along the length of the fault.

Bedrock parent materials within the park are jumbled, as a result of grinding movement along the San Andreas Fault. Sandstone, pillow basalts, shale, Chert, greenstone (basalt), serpentine, and metamorphic rocks are among the bedrock types present. These rocks belong to the Franciscan Assemblage and were originally deposited on the ocean floor 80 to 140 million years ago. The rocks were greatly deformed and partly metamorphosed as the ocean floor was thrust under the western edge of the North American Plate, resulting in a landscape of easily eroded, sheared and crushed sandstone and shale, with occasional blocks of more resistant rock forming prominent outcrops.

The Marin Headlands contains more resistant rocks than the more erodible Franciscan Melange found to the north of Pirates Cove. Radiolarian chert composed of fossilized radiolaria underlies about half of the Headlands, and because of its resistance to weathering, makes up nearly all the ridge tops and summits. The contorted layers in this chert express the plate-tectonic actions in this area and are frequently visited by geology classes. Topographically, melange areas have broader ridge crests and gentler slopes and contain more earthflows than the coherent Marin Headlands. Groundwater is close to the surface and frequently emerges as seeps or springs in the melange area.

Locally, especially in the southwest part of San Francisco, are younger rocks, soft sedimentary deposits that are less than two million years old. The sea cliffs at Fort Funston were formed from the oldest of these tilted fossil-rich beds of sand and clay (the Merced Formation), and are easily eroded by wave action. In the last few hundred thousand years, sand and clay have accumulated as beaches, dunes and nearshore deposits, and these are now exposed at Sutro Heights, Baker Beach, Angel Island and Rodeo Cove.

Many abandoned quarries are found within GGNRA. Dogtown Copper Mine, located just off Bolinas Ridge, is the only known mineral development in the park. It was developed in 1863 and re-worked around the turn of the century. Its two shafts are now abandoned.

With its diversity of rock types and active geologic processes, many of the park's outcrops and locations are commonly included in geologic field trips for college and university classes. These destinations include beaches, coastal bluffs, roadcuts and old quarries.

2.2 Water Resources

The Draft Aquatic/Water Resources Management Plan (GGNRA 1990) provides a description of the water resources found in the park. The varied water resources of the park include groundwater (springs), freshwater (streams and ponds), salt water (the Pacific ocean and San Francisco Bay), transitional areas (brackish lagoons), and seasonal wetlands. Eight significant watersheds are located within the park. They are, from north to south, Lagunitas Creek, Olema Creek, Redwood Creek, Elk Creek, Rodeo Creek, Lobos Creek, West Union Creek, and the San Francisco Watershed lands in San Mateo County. San Pedro Creek, a San Mateo County Park, is within the GGNRA's authorized boundary and is noted here because it is a significant creek with an annual steelhead trout migration.

The water in the GGNRA has many beneficial uses. These are documented by the Bay Area Regional Water Quality Control Board, and include municipal water supply, agricultural supply, fresh water replenishment, water contact and non-water contact recreation, commercial and sport ocean fishing, warm and cold fresh water habitat, terrestrial habitat, the preservation of rare and endangered species, fish migration and fish spawning, and shellfish harvesting. Eleven rare species are associated with GGNRA waters, including eight federally listed species: the California freshwater shrimp (*Syncaris pacifica*), tidewater goby (*Eucyclogobius newberryi*), red-legged frog (*Rana aurora draytonii*), Sacramento River winter-run chinook salmon (*Oncorhynchus tshawytscha*), steelhead trout (*Oncorhynchus mykiss*), coho salmon (*Oncorhynchus kisutch*), San Francisco garter snake (*Thamnophis sirtalis tetrataenia*), and Steller sea lion (*Eumetopias jubatus*).

2.3 Plant Resources

The park is located in the center of the California Floristic Province, one of only five regions in the world with a Mediterranean climate. Complex climatic and geological changes during the past millions of years have interacted to produce a diverse flora rich in endemic genera and species (Raven and Axelrod 1978). One center of endemism in California is the Tamalpais province, an area of high local diversity in soil types and climates (Stebbins and Major 1965, Raven and Axelrod 1978). The park and its neighboring parks contain much of the remaining wild lands of this Tamalpais province. Situated in the great mixing zone of the central California Coast Range, the park includes some species that reach their northern distributional limit as well as others that are at their southern limit; species with northern coastal affinities mingle with those of the southern interior (Howell 1970, Howell, Raven & Rubtzoff 1958).

More than 886 plant species and subspecies exist in the park. A systematic inventory of the park's flora would likely document many more species since most areas within the park have not been systematically surveyed by botanists for more than four decades.

The plant alliances and associations of the park are similarly diverse. An estimated 40 vegetation alliances and more than 60 vegetation associations, as defined in the California Native Plant Society Classification System (Sawyer and Keeler-Wolf 1995) occur in the park. They include such diverse alliances as California oat grass, purple needlegrass, Pacific reedgrass, chamise, leather oak, coffeeberry, blue-blossom, California bay, coast live oak, coast redwood, California buckeye and arroyo willow. They are also among those most threatened by changing land uses, including fire suppression, grazing, and recreational uses, and by the spread of non-native pest plant species.

2.4 Rare and Endangered Species

Thirty-three species in GGNRA are protected under the Endangered Species Act as amended (16 USC 1536 (a) (2) 1982) (Table 1). There are 69 rare or special status wildlife species currently identified as permanent or seasonal residents of the park, or dependent upon park lands and waters for migration. Of these, 12 are listed as federally endangered, 12 are federally threatened, 1 is state endangered, 3 are state threatened, 31 are federal species of concern, and 10 are state designated species of special concern. Numerous other wildlife species (birds in particular) are considered sensitive by the Audubon Society, Partners in Flight, the California Department of Forestry, or are designated Migratory Nongame Birds of Management Concern by the U.S. Fish and Wildlife Service (USFWS). Nearly all of the native birds documented in the park are protected under the Migratory Bird Treaty Act (16 USC 528-531).

Thirty-eight rare or special status plant species are currently identified within GGNRA. Of those species, 9 are Federally Endangered, 1 is Federally Threatened, 13 are Federal Species of Concern, and the remaining 15 species are included or proposed for inclusion by the California Native Plant Society. GGNRA has adopted the policy that all special status plant species be afforded the full protection of the Endangered Species Act.

2.5 Wildlife Resources

The park's diverse habitats support a rich assemblage of wildlife. At least 387 vertebrate species are known to occur within the park boundaries. Species lists compiled from a variety of sources and incomplete inventories include 11 amphibians, 20 reptiles, 53 fish, 53 mammals, and 250 birds (ICE 1999). Terrestrial invertebrates in the park are less well known, with the exception of butterflies at two areas of the park, Marin Headlands and Milagra Ridge, which support diverse butterfly populations.

Wildlife habitats within the park range from introduced eucalyptus and closed-cone Monterey pine and cypress forests, to hardwood, mixed evergreen, Douglas fir, redwood and riparian forests, to coastal scrub, annual and perennial grasslands, freshwater and saline wetlands and wet meadows, as well as estuarine, lacustrine, marine and riverine aquatic habitats. In addition, barren coastal cliffs and islands, and the escaped ornamental gardens of Alcatraz provide habitat for a variety of species.

Alcatraz Island supports regionally significant populations of colonial nesting waterbirds in one of the most internationally visible settings within the NPS. Alcatraz receives 1.4 million national and international visitors each year. The "evolution" of the island's landscape of crumbling ruins and abandoned, overgrown gardens, where natural processes predominate in a manmade environment, has fostered the recent increase in diversity and abundance of colonial waterbirds on the island. Today, the island supports the most diverse assemblage of marine and estuarine colonial nesting waterbirds in San Francisco Bay and some of the most significant wildlife resources within the GGNRA. As many as 4,500 adults and chicks of seven colonial nesting species may inhabit the island during the nesting season.

The island's black-crowned night-heron colony (*Nycticorax nycticorax*) is one of the largest in the greater San Francisco Bay region. The island supports San Francisco Bay's only colonies of Brandt's cormorant (*Phalocrocorax penicillatus*), pelagic cormorant (*Phalocrocorax velagicus*), and pigeon guillemots (*Cepphus columba*). These species usually breed along the outer coast and on offshore islands. The western gull (*Larus occidentalis*) colony represents a significant portion of its coastal breeding population in northern California. Alcatraz is the only San Francisco Bay island with large

Table 1. Special Status Species of Golden Gate National Recreation Area May 1999

COMMON NAME	SCIENTIFIC NAME	Federal	State	Other	IUCN	NDDB Rank
Invertebrates						
Xerces blue butterfly	*Glaucopsyche xerces*			Extinct		
Sthenele satyr	*Cercyonis sthenele sthenele*			Locally extirpated		
Mydas fly				Of local concern: Presidio is only known location		
California freshwater shrimp*	*Syncaris pacifica*	FE	SE		EN	G1S1
Mission blue butterfly*	*Icaricia icarioides missionensis*	FE			NE	G5T2S2
San Bruno elfin butterfly*	*Incisalia mossi bayensis*	FE			NE	G4T1S1
Bay checkerspot butterfly*	*Euphydryas editha bayensis*	FT			NE	G5T2S2
California floater (mussel)*	*Anodonta californiensis*	FSC			NE	G?S2?
Tomales asellid*	*Caecidotea tomalensis*	FSC				G2S2
Sandy beach tiger beetle	*Cicindela hirticollis gravida*	FSC				G5T4S1
Globose dune beetle*	*Coelus globosus*	FSC			VU	G1S1
Ricksecker's water scavenger beetle	*Hydrochara ricksecker*i	FSC			NE	G1G2S1S2
Bumblebee scarab beetle	*Lichnanthe ursina*	FSC			NE	G2S2
Opler's longhorn moth	*Adela oplerella*	FSC				G?S?
Marin elfin butterfly	*Incisalia mossii* ssp. 2	FSC				G4T?S?
Mammals						
Pronghorn antelope	*Antilocapra americana*			Locally extirpated		
Tule elk	*Cervus elaphus*			Locally extirpated		
Grizzly bear	*Ursus arctos*			Locally extirpated		
Salt marsh harvest mouse*	*Reithrodontomys raviventris*	FE	SE	DFG:Fully protected	VU	G1G2S1S2
Northern (Steller) sea lion	*Eumetopias jubatus*	FT			EN	G3S2
Southern sea otter	*Enhydra lutris nereis*	FT		DFG:Fully protected		G4T1S1
Humpback whale	*Megaptera novaeangliae*	FE				
Pacific western big-eared bat*	*Corynorhinus townsendii townsendii*	FSC	CSC		VU	G5T3T4S2S3
Long-eared myotis bat	*Myotis evotis*	FSC				G5S4?
Fringed myotis bat	*Myotis thysanodes*	FSC				G5S4
Long-legged myotis bat	*Myotis volans*	FSC				G5S4?
Yuma myotis bat*	*Myotis yumanensis*	FSC	CSC			G5S4?
Greater western mastiff-bat	*Eumops perotis californicus*	FSC	CSC			G5S3?

COMMON NAME	SCIENTIFIC NAME	Federal	State	Other	IUCN	NDDB Rank
San Francisco dusky-footed woodrat*	*Neotoma fuscipes annectens*	FSC	CSC		DD	G5T2T3S2S3
Point Reyes jumping mouse*	*Zapus trinotatus orarius*	FSC	CSC		LR	G5T2?S2?
Pallid bat	*Antrozous pallidus*		CSC			G5S3
Fishes						
Coho salmon — Central California Coast ESU*	*Oncorhynchus kisutch*	FT				G5S2?
Chinook salmon — Sacramento River winter run	*Oncorhynchus tshawytscha*	FE	SE			G5S1
Chinook salmon — Central Valley fall/late fall-run ESU		FPT				
Chinook salmon — Central Valley spring-run ESU	*Oncorhynchus tshawytscha*	FPE	ST	FS:Sensitive		G5S1
Steelhead — Central California Coast ESU*	*Oncorhynchus mykiss*	FT				G5S2
Steelhead — Central Valley ESU	*Oncorhynchus mykiss*	FT				G5S2
Tidewater goby*	*Eucyclogobius newberryi*	FE	CSC		VU	G2G3S2S3
Pacific lamprey*	*Lampetra tridentata*	FSC				G5S5
Green sturgeon*	*Acipenser medirostris*	FSC	CSC		VU	G4G5S1S2
Tomales roach*	*Lavinia symmetricus* ssp. 2		CSC			G5T2T3S2S3
Amphibians						
California red-legged frog*	*Rana aurora draytonii*	FT	CSC	DFG:Protected		G4T2T3S2S3
Foothill yellow-legged frog*	*Rana boylii*	FSC	CSC	DFG:Protected	NE	G3S2S3
Northern red-legged frog*	*Rana aurora aurora*	FSC	CSC	DFG:Protected		G4T2?S2?
Reptiles						
San Francisco garter snake*	*Thamnophis sirtalis tetrataenia*	FE	SE	DFG:Fully protected	NE	G5T2S2
Northwestern pond turtle*	*Clemmys marmorata marmorata*	FSC	CSC	DFG:Protected FS:Sensitive		G4T4S3
Southwestern pond turtle	*Clemmys marmorata pallida*	FSC	CSC	DFG:Protected		G4T2T3S2
California horned lizard	*Phrynosoma coronatum frontale*	FSC	CSC	DFG:Protected		G4T3T4S3S4
Birds						
California brown pelican	*Pelecanus occidentalis californicus*	FE	SE	FWS:MNBMC DFG:Fully protected		G4T3S1S2
Bald eagle	*Haliaeetus leucocephalus*	FPD	SE	CDF:Sensitive DFG:Fully protected		G4S2
American peregrine falcon*	*Falco peregrinus anatum*	FPD	SE	FWS:MNBMC DFG:Fully protected CDF:Sensitive		G3T2S2

COMMON NAME	SCIENTIFIC NAME	Federal	State	Other	IUCN	NDDB Rank
Western snowy plover	*Charadrius alexandrinus nivosus*	FT	CSC	FWS:MNBMC		G4T2S2
California least tern	*Sterna antillarum browni*	FE	SE	FWS:MNBMC DFG:Fully protected		G4T2T3S2S3
Marbled murrelet*	*Brachyramphus marmoratus*	FT	SE	FWS:MNBMC CDF:Sensitive	LR	G3S1
Northern spotted owl*	*Strix occidentalis caurina*	FT		FWS:MNBMC CDF:Sensitive	LR	G3T2T3S2S3
Swainson's hawk	*Buteo swainsoni*		ST			G4S2
California black rail*	*Laterallus jamaicensis coturniculus*	FSC	ST	FWS:MNBMC DFG:Fully protected WatchList:CA/National		G4T1S1
Willow flycatcher	*Empidonax traillii*		SE	FS:Sensitive		G5S1S2
Bank swallow*	*Riparia riparia*		ST			G5S2S3
Harlequin duck	*Histrionicus histrionicus*	FSC	CSC			G5S2
Ferruginous hawk	*Buteo regalis*	FSC	CSC			G4S3S4
Elegant tern	*Sterna elegans*	FSC	CSC	FWS:MNBMC	LR	G5S1
Western burrowing owl	*Athene cunicularia hypugea*	FSC	CSC	FWS:MNBMC		G4T2S2
Loggerhead shrike*	*Lanius ludovicianus*	FSC	CSC	FWS:MNBMC		G4S4
Tricolored blackbird	*Agelaius tricolor*	FSC	CSC	FWS:MNBMC		G2S2
Bell's sage sparrow*	*Amphispiza belli belli*	FSC	CSC	FWS:MNBMC WatchList:National		G5T2?S2?
Saltmarsh common yellowthroat*	*Geothlypis trichas sinuosa*	FSC	CSC	Calif PIF Riparian SCP		G5T2S2
Great egret (rookery)*	*Ardea alba*			CDF:Sensitive		G5S4
American bittern*	*Botaurus lentiginosus*			FWS:MNBMC		G5S3
White-tailed kite (nesting)*	*Elanus leucurus*			FWS:MNBMC DFG:Fully protected		G5S3
Cooper's hawk*	*Accipiter cooperi*		CSC			G4S3
Sharp-shinned hawk*	*Accipiter striatus*		CSC			G4S3
Golden eagle*	*Aquila chrysaetos*		CSC	DFG:Fully protected CDF:Sensitive		G4S3
Northern harrier*	*Circus cyaneus*		CSC	FWS:MNBMC		G5S3
Osprey*	*Pandion halaetus*		CSC			G5S3
Merlin	*Falco columbarius*		CSC			G5S3
Vaux's swift	*Chaetura vauxi*		CSC	FWS:MNBMC		G?S3
California horned lark*	*Eremophila alpestris actia*		CSC			G4G5T3S3

COMMON NAME	SCIENTIFIC NAME	Federal	State	Other	IUCN	NDDB Rank
Purple martin*	*Progne subis*		CSC			G5S3
Yellow warbler*	*Dendroica petechia brewsteri*		CSC			G5T2S2
Brandt's cormorant*	*Phalacrocorax penicillatus*			WatchList:CA		
Black oystercatcher*	*Haematopus bachmani*			WatchList:CA/National		G5S2
Long-billed curlew	*Numenius americanus*			WatchList:CA/National		
Western gull*	*Larus occidentalis*			WatchList:CA		
California quail*	*Callipepla californica*			WatchList:CA Only 2 SF locations		
Band-tailed pigeon*	*Columba fasciata*			WatchList:Local/ National		
Rufous hummingbird	*Selasphorus rufus*			WatchList:CA/National		
Allen's hummingbird*	*Selasphorus sasin*			WatchList:CA/National		
Nuttall's woodpecker*	*Picoides nuttallii*			WatchList:CA/National		
Olive-sided flycatcher*	*Contopus borealis*			FWS:MNBMC WatchList:CA		G?S4
Pacific-slope flycatcher*	*Empidonax difficilis*			FWS:MNBMC WatchList:CA		
Warbling vireo*	*Vireo gilvus*			FWS:MNBMC Calif PIF Riparian SCP		
Chestnut-backed chickadee*	*Poecile rufescens*			WatchList:Local		
Swainson's thrush*	*Catharus ustulatus*			Calif PIF Riparian SCP		
California thrasher*	*Toxostoma redivivum*			WatchList:CA/National		
Black-throated gray warbler*	*Dendroica nigrescens*			WatchList:CA		
Hermit warbler*	*Dendroica occidentalis*			WatchList:CA/National FWS:MNBMC		G4G5S3?
MacGillivray's warbler*	*Oporornis tolmiei*			WatchList:Local		
Lark sparrow*	*Chondestes grammacus*			FWS:MNBMC		
Song sparrow*	*Melospiza melodia*			Calif PIF Riparian SCP		
Black-headed grosbeak*	*Pheucticus melanocephalus*			Calif PIF Riparian SCP		
Western screech owl*	*Otus kennicottii*			Of local concern: Presidio only remaining SF County location		
Wrentit*	*Chamaea fasciata*			Of local concern: Presidio only remaining SF County location		

COMMON NAME	SCIENTIFIC NAME	Federal	State	Other	IUCN	NDDB Rank
Plants						
Raven's manzanita	*Arctostaphylos hookeri* ssp. *ravenii*	FE	SE	CNPS 1B		
Tiburon Indian paintbrush	*Castilleja affinis* ssp. *neglecta*	FE	ST	CNPS 1B		
Fountain thistle	*Cirsium fontinale* ssp. *fontinale*	FE	SE	CNPS 1B		
Presidio clarkia	*Clarkia franciscana*	FE	SE	CNPS 1B		
San Mateo wooly sunflower	*Eriophyllum latilobum*	FE	SE	CNPS 1B		
San Francisco lessingia	*Lessingia germanorum germanorum*	FE	SE	CNPS 1B		
Santa Cruz island bush mallow	*Malacothamnus fasciculatus* var. *nesioticus*	FE	SE	CNPS 1B		
White-rayed pentachaeta	*Pentachaeta bellidiflora*	FE	SE	CNPS 1B		
San Mateo thornmint	*Acanomintha ovata*.	FE	SE	CNPS 1B		
Marin dwarf flax	*Hesperolinon congestum*	FT	ST	CNPS 1B		
Mason's ceanothus	*Ceanothus masonii*	FSC	ST			
Coast rock cress	*Arabis blepharophylla*	FSC		CNPS 4		
Montara manzanita	*Arctostaphylos montaraensis*	FSC		CNPS 1B		
Marin manzanita	*Arctostaphylos virgata*	FSC		CNPS 1B		
San Mateo tree lupine	*Lupinus eximius*	FSC		CNPS 3		
Delores campion	*Silene verecunda*	FSC		CNPS 1B		
Santa Cruz microseris	*Stebbinsoseris decipiens*	FSC		CNPS 1B		
Tamalpais jewelflower	*Streptanthus glandulosus*	FSC		CNPS 1B1		
San Francisco owl's clover	*Triphysaria floribunda*	FSC		CNPS 1B		
California bottle-brush grass	*Elymus californicus*	FSC		CNPS 4		
Tiburon buckwheat	*Eriogonum luteolum* var. *caninum*	FSC		CNPS 3		
San Francisco wallflower	*Erysimum franciscanum*	FSC		CNPS 4		
Fragrant fritillary	*Fritillaria liliacea*	FSC		CNPS 1B		
San Francisco gumplant	*Grindelia hirsutula*	FSC		CNPS 1B		
Wedge-leaved horkelia	*Horkelia cuneata* var. *sericea*	FSC		CNPS 1B		
Dune gilia	*Gilia capitata* ssp. *chamissonis*	FSC		CNPS 4		
San Francisco spineflower	*Chorizanthe cuspidata*	FSC		CNPS 1B		
Point Reyes salt marsh bird's beak	*Cordylanthus maritimus* ssp. *palustris*	FSC		CNPS 1B		
Point Reyes ceanothus	*Ceanothus gloriosus gloriosus*			CNPS 4		
Glory brush	*Ceanothus gloriosus* var. *exaltatus*			CNPS 4		
Franciscan thistle	*Cirsium andrewsii*			CNPS 4		

COMMON NAME	SCIENTIFIC NAME	Federal	State	Other	IUCN	NDDB Rank
Western leatherwood	*Dirca occidentalis*			CNPS 1B		
Oakland star tulip	*Calochortus umbellatus*			CNPS 4		
Indian paintbrush	*Castilleja subinclusa* ssp. *franciscana*			CNPS 4		
Tamalpais manzanita	*Arctostaphylos hookeri* ssp. *montana*			CNPS 1B		
Choris' popcornflower	*Plagiobothrys chovisianus* var. *chorisianus*			CNPS 3		

KEY TO TABLE 1
* denotes species breeding within Golden Gate National Recreation Area
ESU = Evolutionarily Significant Unit
FEDERAL LISTING STATUS
FE = Federally Endangered
FPE = Federally Proposed Endangered
FT = Federally Threatened
FPT = Federaly Proposed Threatened
FPD = Federal Proposed De-listed
FSC = Federal Species of Concern
STATE LISTING STATUS
SE = State Endangered
ST = State Threatened
CSC = California Species of Special Concern (California Department of Fish and Game 1998)
IUCN RED LIST CATEGORIES (International Union for the Conservation of Nature and Natural Resources and the World Conservation Monitoring Center 1994)
EN = Endangered, high risk of extinction in wild in near future
VU = Vulnerable, high risk of extinction in wild in medium-term future
LR = Lower Risk
DD = Data Deficient, inadequate information to make an assessment
NE = Not Evaluated

NDDB RANKS
California Natural Diversity Database Ranks are a shorthand formula on how rare a taxon is, both throughout its range and within California
Global Ranks: worldwide status of a full species: G1 to G5
G1 = extremely endangered: <6 occurrences, or <1,000 individuals, or 10,000 to 50,000 acres occupied
G2 = endangered: 6-20 occurrences, or 1,000-3,000 individuals, or 10,000 to 50,000 acres occupied
G3 = restricted range, rare: 21-100 occurrences, 3,000 to 10,000 individuals, or 10,000 to 50,000 acres occupied
G4 = apparently secure, some concerns such as narrow habitat or continuing threats
G5 = demonstrably secure, commonly found throughout its historic range
OTHER STATUS LISTINGS:
FWS = Migratory Nongame Birds of Management Concern (MNBMC) (U.S. Fish and Wildlife Service 1995)
FS: Sensitive, U.S. Forest Service, declining species
DFG: Protected and Fully Protected.
CNPS: California Native Plant Society status
1A = Presumed extinct in California
1B = Rare or endangered in California and elsewhere
2 = Rare or endangered in California, more common elsewhere
3 = Needs more information
4 = Plants have limited distribution
Watch List: CA/National and California - National Audubon Society
PIF: Partners-in-Flight
SCP: Species of Conservation Priority
CDF: California Department of Forestry

waterbird breeding colonies that is open to the public. Colonial nesting waterbirds are also considered important biological monitors of the health of estuarine ecosystems. They are high in the food web and may reflect contamination in a variety of ecosystem components. Hundreds of double-crested cormorants (*Phalocrocorax auritus*) also roost on the island during the non-breeding season.

A pair of Heerman's gulls *(Larus heermannii)* nested on Alcatraz in 1980. This was the first published account of Heerman's gulls ever nesting in the United States. Alcatraz represents the northernmost nesting record for this species, which usually nests in Mexico (Howell et al. 1983). Numerous species of landbirds also breed on Alcatraz, including Canada geese (*Branta canadensis*), mallards (*Anas platyrhynchos*), common mergansers (*Mergus merganser*), song sparrows (*Melospiza melodia*), white-crowned sparrows (*Zonotrichia leucophrys*), and common ravens (*Corvus corax*), among others.

Colonial Waterbirds on Alcatraz Island 1996-1998	Maximum Annual Count
Western gull (breeding since mid-1970s)	486 pairs
Black-crowned night-heron (breeding since mid-1970s)	341 pairs
Brandt's cormorant (breeding since 1991)	231 pairs
Pelagic cormorant (breeding since mid-1980s)	20 pairs
Pigeon guillemot (breeding confirmed 1982)	17 pairs
Snowy egret (breeding since 1997)	11 pairs
Great egret (bred 1995 to 1997)	2 pairs
Black oystercatcher (breeding confirmed 1995)	1 pair

One native amphibian, the California slender salamander (*Batrachoseps attenuatus*), and one native mammal, the deer mouse (*Peromyscus maniculatus*), also inhabit Alcatraz. A portion of the deer mouse population exhibits unusual coloring and may represent a morphologic or genetic trait unique to Alcatraz.

The park supports other small seabird colonies along coastal cliffs and offshore rocks. Bird Island in Marin County is one of the largest roosting sites in northern California for the endangered California brown pelican (*Pelecanus occidentalis californicus*), with up to several thousand roosting pelicans. The pelicans also bathe, feed and roost in nearby Rodeo Lagoon. Western gulls nest on Bird Island; Brandt's cormorants nested there historically and several hundred regularly roost on the island. Breeding cormorants may have been displaced by the recovering brown pelican population. Western gulls and Brandt's cormorants still nest at Lobos Rocks, Land's End and Seal Rocks in San Francisco. Pelagic cormorants nest in very small colonies on precipitous cliffs and sea stacks from the Golden Gate north to Stinson Beach. Black oystercatchers nest on isolated rocky shorelines in the same area. Peregrine falcons are seen foraging along the coastal cliffs and have nested from the Golden Gate Bridge north to Muir Beach.

Sandy beaches, lagoons and estuaries throughout the park, including Tomales Bay, Bolinas Lagoon, Stinson Beach, Muir Beach, Big Lagoon, Rodeo Lagoon, the Golden Gate, Crissy Field and Ocean Beach, provide important habitat for concentrations of migrating and wintering water and shorebirds. Waters within the park are particularly important for loons; grebes; scoters; brant (*Branta bernicla*); numerous species of dabbling ducks, diving ducks, and gulls; Forster's (*Sterna forsteri*), elegant (*Sterna elegans*) and Caspian (*Sterna caspia*) terns; willets (*Catoptrophorus semipalmatus*); sanderlings (*Calidris alba*); western sandpipers (*Calidris mauri*); least sandpipers (*Calidris minutilla*); dunlin (*Calidris alpina*); short-billed dowitchers (*Limnodromus griseus*); and red-necked phalaropes (*Phalaropus lobatus*). Nearshore marine waters provide foraging for hundreds of thousands of sooty shearwaters (*Puffinis griseus*) during spring, summer and fall.

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Isolated coastal rocks, beaches, and lagoon sand flats in the park serve as haul-outs for harbor seals and California sea lions (*Zalophus californianus*). Up to 250 harbor seals haul out in Point Bonita Cove at Marin Headlands, and significant harbor seal pupping areas are found in Bolinas Lagoon and Tomales Bay within or directly adjacent to the park. As the northern elephant seal (*Mirounga angustirostris*) population rapidly increases, they are encountered more frequently on sandy beaches throughout the region. California gray whales (*Eschrichtius robustus*), humpback whales (*Megaptera novaeagliae*) and harbor porpoises (*Phocoena phocoena*) use nearshore waters and young whales occasionally wander into San Francisco Bay. Southern sea otters (*Enhydra lutris nereis*) are infrequently seen offshore with numbers increasing as the population spreads north.

Terrestrial habitats within the park support a diversity of mammal and bird species. High densities of meso-carnivores, including the gray fox (*Urocyon cinereoargenteus*), bobcat (*Felis rufus*), and the recently reestablished coyote (*Canis latrans*), inhabit coastal scrub and grasslands in Marin County (Olema Valley, Bolinas Ridge, Tennessee Valley and Marin Headlands), and at Sweeney Ridge and San Francisco Watershed lands in San Mateo County. Mountain lions (*Felis concolor*) have been documented to occur throughout undeveloped areas of these two counties. These carnivores feed on a variety of small and large mammals such as the black-tailed deer (*Odocoileus meionus*), broad-footed mole (*Scapanus larimanus*), pocket gopher (*Thomomys bottae*), deer mouse (*Peromyscus maniculatus*), western harvest mouse (*Reithrodontomus megalotis*), California vole (*Microtus californicus*), and brush rabbit (*Sylvilagus bachmani*). Badgers (*Taxidea taxus*) are also infrequently encountered. Research by the U.S. Geological Survey (USGS) Biological Resources Division has documented that significantly higher mammalian diversity occurs on ungrazed grassland and coastal scrub than on similar habitat grazed by cattle in the Olema Valley. Some species, such as the western harvest mouse, appear to be restricted to areas where native perennial grasses persist.

Similar differences in diversity between grazed and ungrazed habitats have been documented for landbirds in GGNRA and Point Reyes National Seashore, through research conducted by Point Reyes Bird Observatory. Point Reyes Bird Observatory encountered 83 bird species during 1997 landbird censuses in coastal grassland, coastal scrub, riparian, and mixed hardwood. Species diversity was approximately one-third higher in riparian than in other ungrazed habitats, but was six times higher than in grazed grassland. Species richness was nearly twice as high in riparian habitat than in other ungrazed habitats, but nine times greater than in grazed grassland. Songbird nest monitoring in riparian habitats along Redwood and Lagunitas creeks indicates that nest success for the four most common species: the song sparrow, Swainson's thrush (*Catharus ustulatus*), warbling vireo (*Vireo gilvus*) and Wilson's warbler (*Wilsonia pusilla*), is low and that census counts do not adequately document species status. Three of these species are neotropical migrants and three are designated riparian species of conservation priority by California Partners-in-Flight.

Two coastal grassland/scrub areas in the park are known for their high numbers and diversity of butterflies: Marin Headlands and Milagra Ridge. The federally listed endangered mission blue butterfly (*Icaricia icarioides missionensis*) occurs at both sites, while the San Bruno elfin (*Euphydryas editha bayensis*) is found at Milagra Ridge where it inhabits rocky outcrops. At least 44 species of butterflies occur in the Marin Headlands and 34 species occur at Milagra Ridge, illustrating the importance of habitat fragments within largely developed landscapes. Various species of skippers, swallowtails, hairstreaks, blues, ladies, admirals and crescents inhabit these areas.

In contrast to the extensive coastal grassland/scrub habitats are the coast redwoods of Muir Woods National Monument. Muir Woods is home to the last remaining contiguous stand of old growth coast redwoods (*Sequoia sempervirens*) in Marin County and represents a fragmented island of the redwood

forest that existed 150 years ago. GGNRA is currently conducting a wildlife inventory of the old growth forest to better understand its wildlife value. Two pairs of northern spotted owls (*Strix occidentalis caurina*) occupy Muir Woods, and while potential marbled murrelet (*Brachyramphus marmoratus*) habitat exists, none have been detected in two years of surveys. At least 69 bird species occur within Muir Woods, the most common being the Pacific-slope flycatcher (*Empidonax difficilis*), winter wren (*Troglodytes troglodytes*), golden-crowned kinglet (*Regulus satrapa*) and chestnut-backed chickadee (*Parus rufescens*). Numerous breeding bird species within Muir Woods are neotropical migrants identified as species of management concern.

Thirty species of mammals have been documented in Muir Woods, ranging from the vagrant shrew (*Sorex vagrans*) and Trowbridge's shrew (*Sorex trowbridgii*) to the Sonoma chipmunk (*Tamius sonomae*), western gray squirrel (*Sciurus griseus*), oppossum (*Dedelphis virginiana*), and black-tailed deer (*Odocoileus heminous*). Spotted owls feed primarily on dusky-footed woodrats (*Neotoma fuscipes*). Carnivores include the raccoon (*Procyon lotor*), striped (*Mephitis mephitis*) and spotted skunks (*Spilogale gracilis*), long-tailed weasel (*Mustela frenata*), gray fox (*Urocyon cinereoargenteus*), coyote (*Canis latrans*), bobcat (*Felis rufus*), the recently returned river otter (*Lutra candensis*), and mountain lion (*Felis concolor*). The most diverse group of mammals found in Muir Woods is bats. Nine species have been identified by mist-netting, acoustic monitoring or spot-lighting in 1999. Three of the species, Pacific western big-eared bat (*Corynorhinus townsendii townsendii*), fringed myotis (*Myotis thysanodes*), and Yuma myotis (*Myotis yumanensis*), are federal and/or state species of concern. Preliminary data from guano traps set in redwood fire-scar cavities in Muir Woods indicate that 60 percent may be used by roosting bats.

Bats have also been studied at the Marin Headlands and on the Presidio. Several historic World War II structures at Marin Headlands were found to be occupied by the Townsend's western big-eared bat, and the Yuma myotis, both federal species of concern. The Brazilian free-tailed bat (*Tadarida brasiliensis*) forages over coastal scrub habitat within Marin Headlands.

While mammalian diversity is low on the Presidio, six species of bats were detected during acoustic surveys conducted as part of wildlife inventories of the Presidio in 1994. By far the most common species was the Mexican free-tailed bat, with hoary bats (*Lasiurus cinereus*) the next most common species encountered. Mountain Lake was found to be the primary bat foraging area, while forest edges between multi-aged forest stands and open areas supported the highest diversity of bats.

Wildlife inventories and a search of collections documented a total of 262 vertebrate species recorded on the Presidio. Approximately 15 of 27 native species of reptiles and amphibians, and 16 of 21 species of native mammals are believed to still occur. For species with poor dispersal capabilities such reptiles, amphibians, and small mammals, the Presidio is an isolated island surrounded by water and urbanization. Common and widespread species, such as the California slender salamander (*Batrachoseps attenuatus*), alligator lizard (*Gerrhonotus coerleus coeruleus*), California voles (*Microtus californicus*), and western harvest mice (*Reithrodontomys megalotis*) occupy a wide range of habitats and appear to have stable populations on the Presidio. In contrast, these isolated conditions could contribute to future losses of rare species such as the Coast Range newt (*Taricha torosa torosa*), western skink (*Eumeces skiltonianus skiltonianus*), sharp-tailed snake (*Contia tenuis*), Pacific ring-necked snake (*Diadophis punctatus amabilis*), Santa Cruz garter snake (*Thamnophis couchi atratus*), and the gray fox (*Urocyon cinereoargenteus*).

More than 85 percent (225 species) of all vertebrate species that have been observed on the Presidio are birds. The vast majority of these are spring and fall migrants or winter visitors. Approximately 60

species are expected to nest on the Presidio. Lobos Creek and Mountain Lake are especially important habitat areas for a variety of riparian and forest nesting birds. The forests, coastal scrub and grassland, and riparian habitats on the Presidio provide the only large area of open space for migratory birds on the northern San Francisco peninsula.

The Presidio's native habitats and introduced forest are regionally important to nesting olive-sided flycatchers (*Contopus borealis*) and other neotropical migrants (most flycatchers, vireos, warblers, tanagers and grosbeaks), locally declining species such as California quail (*Callipepla californica*), western screech owl (*Otus kennicottii*), wrentit (*Chamaea fasciata*), and Hutton's vireo (*Vireo huttoni*), and at least one species, the hooded oriole (*Icterus cucullatus*), that reaches the northern limit of its breeding range. For these reasons, the Presidio is a link of vital importance to resident and migratory birds in a severely threatened, and poorly understood portion of the Pacific flyway.

2.6 Marine Resources

More than 24 miles of ocean and bay coastline are in the park. Coastal and bay resources comprise biologically diverse and complex ecosystems, which contain a rich array of marine invertebrates and algae (Table 2). Intertidal communities within or adjacent to the boundaries include: islands, islets, reefs, rocks, straits, lagoons, mudflats, beaches, piers, wharves, the Gulf of the Farallones, and the San Francisco Bay-Estuary.

Table 2. Significant Marine Resources in the Golden Gate National Recreation Area

Slide Ranch	Marine life is the most abundant and finest among exposed outer coastlines along the central California shores; a rich display of sponges, bryozoans and tunicates and highly diverse marine invertebrate fauna is matched only by Point Reyes and Tomales Bay in tunicate diversity.
Muir Beach	A wide variety of submarine sponges, hydroids, bryozoans and tunicates.
Pirates Cove	Pristine tidepool life; diversity and abundance are exemplary.
Tennessee Cove	Unique geological features: highly polished living limpet shells of *Collisella digitalis* very unusual: the only spot in central California that they have been observed. Sea caves contain the isopod *Ligia occidentalis* of unusually large size.
Kirby Cove	Contains giant isopods, some nearly twice normal length. Such large organisms are not common. High densities of starfish *Pisaster ochraceous* and *Patiria miniata.*
Bird Island	Greatest marine resource of the Marin Headlands area, a guano-covered sea stack producing abnormally sized marine invertebrates and plants: containing largest size and greatest densities of chilipepper shrimp (*Tigriopus californica*) ever observed on Pacific Coast, as well as large California mussels up to seven inches in length, and surfgrass (*Phyllosphadix* sp. — leaves to eight feet in length — marine kelp (*Pterygophora californica*) and giant kelp (*Macrocystis californica*) — some stipes seven feet long — green anemone and the purple seastar are of giant proportions. The underwater marine life is exceedingly abundant —all rock surfaces covered with the thickest layer of sponges, hydroids, bryozoans, and tunicates ever observed by Chan in northern California.
Fort Point	Unusually high and significant number (932) of starfish, *Pisaster ochraceous*, were counted in a 100-meter transect on north seawall.

Source: Chan 1974

GGNRA also contains approximately 50 percent of the rocky intertidal habitat found in the bay (Oceanic Society 1989). Three of the four sites in the San Francisco Bay containing the richest and most pristine assemblage of algae are within the GGNRA: Fort Point, Lime Point and Point Cavallo (Silva 1979). The Alcatraz intertidal zone ranks high in its abundance and diversity of marine algae. The bay flora is far richer than that found in sites outside the Golden Gate, which offer essentially only one habitat (Silva 1979). Within the park management boundaries, 87 marine plant and algae species are present (R-MAP 1996 update for GGNRA). Marine plant and algae along The Presidio and Fort Point total 47 and 66 species, respectively (R-MAP 1996 update for GGNRA).

Intertidal and subtidal areas of the park provide important spawning and rearing habitat for fish. Anchovy spawn in the bay and may play an important role in the population dynamics of anchovy in the California Current (McGowan 1984). From December through April, commercially important Pacific herring (*Clupea pallasi*) spawn in Tomales Bay, the intertidal rocks of Alcatraz, and other central bay rocky shorelines (Inase 1974, USFWS 1989). The reef at Alcatraz also provides a place where many fish feed at high tide (Inase 1979). Due to nearshore and offshore currents, fish cyclically crowd the surf zones of Ocean Beach, Stinson Beach, Bolinas Beach and Dillon Beach (Chan 1974). The intertidal zone supplies fishermen with perch, surf fish, cabezons, blennies, rock fish, abalone, eels, mussels and sea urchins. Typical estuarine fish include brown smoothhound, pile surfperch and white croaker. Lamprey, steelhead trout and coho salmon maintain their annual migrations up Redwood Creek, Olema Creek and Lagunitas Creek. Chinook salmon are commonly caught from park fishing piers within the bay. Green and white sturgeon can still be found in lower Lagunitas Creek, Tomales Bay, and the San Francisco Bay-Estuary.

Commonly visited and accessible intertidal areas in Marin County include Stinson Beach, Slide Ranch, Muir Beach, Tennessee Cove, Rodeo Lagoon and Beach, Bonita Cove, Kirby Cove Beach and Lime Point. The intertidal zone along the coast of Marin County is generally steep and rocky, with small beaches occurring adjacent to watershed drainage areas. Much of the GGNRA intertidal zone in San Francisco County is beach or pier habitat and is also frequently visited. These areas include Fort Funston, Ocean Beach, Land's End, China Beach, Baker Beach, Fort Point, Crissy Field, Fort Mason, Black Point, and Aquatic Park. Many of the intertidal areas serve as living outdoor classrooms for Bay Area residents and visitors. Slide Ranch is frequented by school children, disabled adults and the general public. Areas like Rodeo Beach, Point Bonita, and Fort Baker also provide organized educational experiences.

A multitude of fish species occur offshore of the GGNRA in the Pacific Ocean and the San Francisco Bay. Limited information about fish species and abundance is available from beach seines and trawls conducted by the California Department of Fish and Game for their Delta Outflow/San Francisco Bay study (Fleming 1995) Intertidal and subtidal areas of GGNRA provide spawning habitat for many fish. Anchovy spawn in the bay and may play an important role in the population dynamics of anchovy in the California Current (McGowan 1984). From December through April herring (*Clupea pallasi*) spawn in Tomales Bay, the intertidal rocks of Alcatraz, and other central bay rocky shorelines (Inase 1974, USFWS 1989). The reef at Alcatraz also provides a place where many fish feed at high tide (Inase 1979). Due to nearshore and offshore currents, fish cyclically crowd the surf zones of Ocean Beach, Stinson Beach, Bolinas Beach and Dillon Beach (Chan 1974). The state-protected Dungeness crab (*Cancer magister*) breeds along all sandy beaches. The intertidal zone supplies fishermen with perch, surf fish, cabezons, blennies, rock fish, abalone, eels, mussels and sea urchins.

2.7 Air Resources and Night Sky

Visitors to the park typically enjoy good air quality within the park, despite its proximity to an urban area. Incoming offshore winds generally keep the air in good condition. Sweeping views of the Bay Area and coastline are a trademark of the park. The quality of the air is also vital to the health of the park's ecosystems.

Darkness is a valuable resource for visitors, and critical to the welfare of the park's wildlife. High points in open areas within the park provide excellent opportunities to view the night sky. In particular, such areas that have little or no artificial lighting are sought by visitors to practice amateur astronomy close to home. Wildlife habitat is more valuable when unimpaired by artificial light.

Some areas of the park provide visitors with natural quiet. This is the condition attained when a person with normal hearing can hear nothing but the sounds produced by natural components of the park. It may include "silence" — the apparent absence of any sound; or the rush of air over the wings of a soaring bird; the gentle swish of the wind in the trees; or the overwhelming crash and roar of the ocean on a stormy day. Most often, it is thought of as a mixture of mostly low-decibel background sounds, punctuated by the calls and clatter of wildlife. While much of the park is no longer "naturally quiet," it may be critical to the wildlife to minimize anthropogenic sound.

3 CONDITIONS AND THREATS TO NATURAL RESOURCES

Many of the natural resources within the GGNRA are deteriorating and are in need of rejuvenation and protection. Past and current land uses have taken a toll on the land, water, air, plants, wildlife, and silence. Current recreational use pressures and practices have added to the continued degeneration of the park resources.

Major current threats to the health of the natural resources include: 1) development adjacent to park boundaries, 2) impacts from visitor uses, 3) non-native species invasion, 4) continuing repercussions of past land use practices, 5) erosion, 6) water diversions, 7) water contamination, 8) lack of fire stimulus to fire-adapted environments, 9) continued park development, and 10) grazing.

The history of the natural areas within GGNRA is intimately tied to the people who worked this land. Soon after the arrival of Europeans, a fire suppression policy began changing the cultural land management practice of annually burning vast areas. Later, agricultural activities began in northern and southern Marin County. The grazing environment of Marin continues to be an important element of the landscape. The 1850s brought the military to San Francisco and San Mateo counties and to southern Marin County, to protect the Golden Gate. The next century saw a wide range of military impacts on the land. Since the establishment of GGNRA, the uses of the land have drastically shifted from the impacts of large organizations to the impacts of individual and group users. The urban pressures for virtually every type of land use are extreme.

3.1 Geologic and Mineral Resources

From an aerial view of the GGNRA landscape, the threats posed to the park from erosion are clear. Coastal waves rhythmically crash against the shoreline; deep, long gullies originate at old roads; heavily used areas are devoid of vegetation; undesignated social trails crisscross through the natural areas; and landslides or slumps exist in most of the small valleys.

Large gully networks range in character from persistently devegetated, rilled slopes to large individual channels up to 15 feet deep and wide. These gullies have been caused by a combination of locally intense rainfall, human disturbance and the presence of highly erodible soils. Many of the gully systems continue to enlarge or are reactivated by uncorrected or renewed land disturbance each year. Other channels have stabilized but remain as persistent scars on the landscape.

Past and current land use practices have altered vegetative composition, aggravated and increased soil erosion, and precipitated landslide activity and recurrent gully formation. These practices have contributed to increasing sediment loads to streams, bays and shorelines. They have also accelerated the loss of large quantities of top soil and have resulted in prominent visual scars and recurrent maintenance costs. Rare species, like the state-listed bank swallow, are affected by erosion from current land uses. At Fort Funston, visitors climb the cliffs and aggravate erosion in the sensitive cliff nesting area. Cultural resources are also threatened in locally active areas such as Alcatraz, where the Warden's House has been undermined by cliff erosion, and Fort Funston, where bluff erosion has claimed coastal batteries.

Some of the worst and most obvious problem areas are in grasslands. Almost without exception, major erosional features have been caused by the diversion of streams or the concentration of seasonal storm runoff by roads and trails.

Past land uses have accelerated erosion in many ways:

1. Many roads developed prior to park establishment were improperly aligned and constructed. These factors have resulted in inadequate drainage, which has led to concentrations of water. These concentrations have created gullies and carried increased sediment yields into creeks, which in turn impairs water quality. In addition, water diversions and the concentration of runoff may initiate or accelerate landsliding in sensitive areas.

2. Grazing has increased erosion by decreasing the amount of vegetation available to capture water, and by compacting the soil, thus deterring infiltration. This then increases runoff, which carries topsoil and sediments into the creeks.

3. Off-road vehicles, hang gliders, bicyclists, horses, dogs, hikers, and other visitors have created denuded areas with compacted soil. Compaction also inhibits infiltration, increasing runoff and erosion. The trend of increasing trail use portends a long term and potentially increasing threat.

The eroding shoreline at the coast of GGNRA threatens beaches and bluffs. The potential exists for the destruction of structures located both within and outside the park. Erosion from wave attack and wind-blown sand occurs on all shorelines. Since human development began, this erosion has increased. Shoreline protection measures, trampling, and drainage changes have all contributed to accelerated erosion. Global warming and associated sea level rise will exacerbate coastal erosion.

Earthquake damage threats depend on the type of underlying material (WRMP 1990). Upland areas on bedrock generally have a low seismic hazard, whereas baylands, unconsolidated sand, and artificial fill areas (such as Crissy Field, Aquatic Park, Fort Mason docks, the mouth of Lobos Creek and along Ocean Beach) may experience intense shaking, subsidence, differential settling and liquefaction. Resultant hazards can include the breaking of water and sewer pipes, streets, sidewalks, concrete structures, etc. Seismic activity can also trigger slope failures.

Serpentine outcrops provide the substrate for a rare habitat that is utilized by many rare plants. These rare sites are found here along the highly developed central California coast. GGNRA serpentine sites are small, and are threatened by a lack of protection. These outcrops are generally unstable and very erodible. Activities such as trampling and grading in or near the outcrops exacerbates the erosion.

Landslides and slumps are potential hazards in the GGNRA. Slopes in the Coast Range are inherently unstable. The strength of the rock has been reduced by intense shearing associated with faulting along the plate margin. Ongoing uplift of the mountains causes continued erosion as the landscape strives to become stable. Surface disturbances, such as cuts for trails and roads, and alteration of surface water drainages, can trigger or lead to slope failures. Most active slumps and landslides in the park are caused by human activities.

3.2 Water Resources

The water resources of the park are constantly under pressure from the urban factors that surround them. This leads to a decrease in water quantity and quality which threatens aquatic and marine species, terrestrial plants, wildlife, and recreational uses.

Historic and current alterations to wetlands and aquatic sites have led to a decrease in functions and species abundance and diversity within the park. Historic fill in wetland and aquatic sites, such as at Fort Baker and Crissy Field, has resulted in long-term loss of habitat. Undersized road crossings and near-

channel developments force the clearance of woody materials and vegetation that impair many creeks' ability to support aquatic life.

Decreases in water quantity due to continued water diversions are partially responsible for the decrease in wetland and lagoon habitats, and for the decrease in rare anadromous fish populations. Water rights issues are a concern at Redwood Creek, Lagunitas Creek, Stinson Gulch, Easkoot Creek and McKinnan Gulch. The potential for continued water rights conflicts exists and threatens to continually decrease the amount of water available to the park's natural resources. Areas in the park from which fresh water is diverted include Lagunitas Creek, Olema Creek, Redwood Creek, Tennessee Valley and Lobos Creek. Surface water diversions either upstream or within the park boundaries include: Lagunitas Creek, Olema Creek, Stinson Gulch, Easkoot Creek, Redwood Creek, Tennessee Valley and Lobos Creek. Groundwater is also withdrawn from many of the park's watersheds.

San Francisco Bay-Estuary depends on freshwater inflows from the delta. The bay now receives less than 50 percent of its historical freshwater inflows. The biological communities of the Bay-Estuary are altered by the disruption of natural flow patterns.

Current and past land uses in and adjacent to GGNRA have contributed to fresh water contamination. Agricultural practices, including farming, ranching and stable operations, have caused sedimentation, and organic waste and pesticide problems. Poorly constructed and poorly maintained roads, inherited from prior land owners, concentrate water. This causes gullies, which, in turn, carry sediment into the water resources. Fresh water contamination was identified in a survey conducted by the USGS at eight stations in GGNRA fresh water streams from 1986 to 1988. Bacterial contamination of water and unusually high values of iron, copper, lead, phosphorus, cadmium, and pH were noted at several sites (Medej 1980).

Bay and marine water contamination from toxins, sewage and sediments threaten many park resources. The use of extremely toxic boat chemicals in harbors has led to the contamination of waters around many Bay Area marinas, including the marina adjacent to Fort Mason, and those in Sausalito and Richardson Bay (Citizens for a Better Environment (CBE) 1987). Studies have detected concentrations of silver, cadmium, selenium, DDE and PCBs in Dungeness crab (Tasto 1979). Historic discharge of wastewater effluent at Land's End may have resulted in the impoverished marine flora noted by Silva (1979). However, the Mile Rock outfall structure at Land's End has since been abandoned by the City of San Francisco. Other sewage treatment outfall structures are located adjacent to and within GGNRA in Sausalito and Ocean Beach in San Francisco.

Dog, horse, cattle and human waste may be a significant source of nearshore and lagoon contamination. A substudy of the San Francisco Sewage Master Plan determined that bacterial contamination of waters off Ocean Beach was significant, due to dog fecal matter deposited along the shoreline. The impacts of sewage from the septic systems which serve Muir Beach, Tennessee Valley, Frank's Valley and Slide Ranch have not been studied.

Oil spills occur frequently in the bay and ocean, with some of the most recent affecting GGNRA coastal resources in 1971, 1976, 1980, 1986 and 1989. Seven oil refineries are located in the Bay Area, and oil accounts for 75 percent of the tonnage entering the bay. Past frequencies of oil spills are likely to continue due to the continual pressure to open nearby outer continental shelf leases for oil exploration and development, and due to the existence of refineries here. Oil spills pose a threat to waterfowl, shorebirds and other tidal wetland associated animals (Moffitt and Orr 1937, Houghton et al. 1989).

Resource losses also result from the oil clean up procedure. Mechanical graders used to clean up the oil remove the top six inches of sand along with the oil. This top six inches is where most sand dwelling species occur.

Dredging materials are currently dumped 300 yards off Alcatraz Island, throughout the Golden Gate shipping channel and at the San Francisco Bar. In 1989, DDE-contaminated sludge was dumped near Alcatraz. Dredging operations can modify or destroy benthic marine resources, which in turn impact intertidal resources. Environmental impacts resulting from a dredging operation potentially include disruption of communities, removal of habitats, a reduction in habitat diversity, destruction of spawning areas, suffocation and burial of organisms, gill abrasion by coarse particles, flocculation of algae, reduction of primary productivity and food finding abilities, increased turbidity and suspended solid levels, alteration of water velocity and current patterns, alteration of the sediment-water interface, increased oxygen consumption and the release of biostimulants and toxic chemicals (Wakeman 1975).

Radioactive wastes dumped in the Gulf of the Farallones National Marine Sanctuary (between 1946 and 1970) are potential environmental hazards (Chan 1977). Approximately 25 percent of the more than 47,500 barrels of radioactive waste have imploded (Dyer 1975). Plutonium and cesium are leaking into the sanctuary and threaten to contaminate the Pacific herring, Dover sole, rockfish, sablefish and Dungeness crab that are commercially fished in the area (San Mateo Times 1990).

Landfills and localized hazardous waste contamination related to past activities have affected the natural resources by changing the soil, vegetation and wildlife habitats. Groundwater is affected and can carry contaminants to freshwater resources and eventually to the bay or ocean. The Presidio of San Francisco has undergone a thorough review of such areas in an attempt to mitigate them in the most effective and efficient manner.

3.3 Plant Resources

Fire was a frequent occurrence in many Mediterranean plant communities, particularly grasslands, chaparral, and scrub. Lightning strikes caused some fires, but during the Holocene, California Indians regularly used fire to manage the landscape for their diverse cultural products. A fire history of the park suggests that in prehistoric times wildland burning occurred at frequencies of 21 to 27 years (McBride and Jacobs 1978). Suppression or complete exclusion of fire during recent decades eliminated the many beneficial effects of fire. These effects on native plant communities are documented in the Fire Management Plan for the park (NPS 1987). Without fire, plant diversity is declining in fire-adapted plant communities such as chaparral and oak woodlands. Douglas fir (*Pseudotsuga menziesii*) and other forest species less tolerant of regular fires are invading these communities, potentially threatening the long-term viability of several rare plant species endemic to chaparral.

Grazing historically occurred on many areas of the park; cattle currently graze on nearly 30 percent of the land within the park. Most of this area is in the park's Northern District and is administered by Point Reyes National Seashore staff, who have prepared Range Management Guidelines to guide management in these areas. Several areas administered by GGNRA are grazed by horses. Due to staffing limitations, management of these areas is sporadic. The lack of a management presence has resulted in adverse impacts to the land.

Grazing is no longer allowed in the Rodeo, Gerbode and Tennessee valleys. The effects of historic grazing practices remain evident and pervasive. These effects include expanding erosion gullies, soil compaction, nutrient enrichment, altered hydrology, increased vegetation cover of non-native pest plant

species, and non-native pasture species that have naturalized from plantings and are now expanding into adjacent areas. The natural and recreational resources of these valleys are dramatically affected by the cumulative effect of these changes. In conjunction with other land use changes (i.e., fire suppression), these effects have altered native plant community composition. Native shrub invasion into grasslands is proceeding rapidly, thereby lessening the amount of edge habitat available for wildlife. If shrub encroachment is unchecked by fire, extensive areas of species-rich native coastal prairie will be lost.

The broad variety of recreational uses and high visitation rates combine to create significant effects on natural resources. Hang gliders, off-leash dogs, mountain bikers, horse riders, environmental education groups, and hikers directly and indirectly affect wildlife, vegetation, and soils. The high level of visitor use—more than 20 million annually—creates increasing demands for new development or expansion of existing developments. Such development leads to further fragmentation of wildlife habitat, increased soil disturbance, and non-native pest plant invasion.

The effects of such high visitation rates on natural resources can be partially addressed by improved visitor management: increasing formal and informal education (ranger-led walks and stewardship programs, interpretive signs), increasing enforcement patrols, and closing social trails. But the park's most important tool for slowing and reversing long-term declines in local biodiversity is the stewardship of the land by local communities. The park's extensive restoration efforts are directed towards addressing the impacts of past and current development and recreational use. Its community outreach programs bring in hundreds of park visitors for programs in native plant stewardship and non-native plant species management.

Non-native pest plant species thrive in the park, particularly in areas subject to intensive historic land use (grazing, military occupation) or adjacent to urbanized areas that are a constant source of weed invasion. The spread of non-native plants represents the most significant threat to the biodiversity of the park. One or several of the park's 21 most invasive non-native pest plant species invade approximately 85 percent of the park's estimated 48 plant communities. Research on these invasive plants within the park have been shown to alter community composition and reduce the diversity of native plants (Alvarez and Cushman 1997), insects (Fisher 1997) and small mammals (Howell, pers. comm. 1997). Invasive non-native species are also found within all nine Special Ecological Areas designated as the most biologically intact and diverse areas within the GGNRA (NRMP 1994). Non-native species also directly threaten habitat for the federally endangered mission blue and San Bruno elfin butterflies, Raven's manzanita, Presidio clarkia, and San Francisco lessingia, as well as 12 other special status plants (state and CNPS listed).

GGNRA has currently targeted the 22 most invasive non-native species for control. These species include: Monterey pine (*Pinus radiata*), eucalyptus (*Eucalyptus globulus*), Monterey cypress (*Cupressus macrocarpa*), black acacia (*Acacia melanoxylon*), thoroughwort (*Ageratina adenophora*), cotoneaster (*Cotoneaster* sp.), helichrysum (*Helichrysum petiolare*), Himalayan blackberry (*Rubus discolor*), tall fescue (*Festuca arundinacea*), harding grass (*Phalaris aquatica*), French broom (*Genista monspessulana*), striated broom (*Cytisus striatus*), Scotch broom (*Cytisus scoparius*), Cape ivy (*Delairea odorata*), Ox-eye daisy (*Leucanthemom vulgare*), pampas grass (*Cortaderia jubata*), yellow star thistle (*Centaurea solistalis*), periwinkle (*Vinca major*), gorse (*Ulex europaeus*), capeweed (*Arctotheca calendula*), English ivy (*Hedera helix*), calla lillies (*Zantedeschia aethiopica*). These invasive plant populations are considered under control due to a decade of volunteer, staff and grant expenditures. And despite the extensive urban perimeter around the park, only two new invasive species have established small populations within the park within the last decade.

Nearly 40 percent of the flora in the best studied park unit (the Presidio of San Francisco) is non-native. The extent of invasion is also impressive. At least 10 percent of the 12,000 acres of the Marin Headlands are dominated by non-native species. These non-native plant species affect native biodiversity by displacing rare plant species, altering ecosystem function and process, and changing the natural and cultural aesthetics of the park.

3.4 Rare and Endangered Species

Wildlife

The endangered **California brown pelican** has significant roost areas in GGNRA (NPS 1982). Pelicans have been observed roosting at Seal Rocks, Alcatraz Island, the Hyde Street Pier, Bird Island, and Kent Island in Bolinas Lagoon. Bird Island supports one of the largest concentrations of roosting brown pelicans in northern California with several thousand commonly present in summer and fall. Brown pelicans feed along the outer coast of GGNRA and in Bolinas and Rodeo lagoons. Any threats to roosting or fishing resources can affect them. Human activity, off-leash dogs, and small fishing boats nearshore pose a threat to these roosting areas. Pollution, oil spills, impacts to fisheries, and climatic factors could also cause changes in the quantity and quality of their main source of food, the northern anchovy.

The endangered **American peregrine falcon** (*Falco peregrinus anatum*)has historically nested at three sites in GGNRA (Walton pers. comm. 1991). It has been released from hack sites at Muir Beach from 1983 to 1987 and in 1998. Recolonization first occurred in the Marin Headlands area in the spring of 1990, with a pair resident between the Golden Gate Bridge and Muir Beach throughout the decade. This pair has nested sporadically and mostly without success over the last nine years. Threats to this aerie include visitation by fishermen and adventurers, and toxic contaminants. Between 15 and 30 peregrine falcons of all three subspecies — tundra, Peale's, and the continental — have been observed in the GGNRA by the Golden Gate Raptor Observatory. Peregrines are also known to over-winter on Bolinas Lagoon. Peregrine falcon decline is linked to the organochlorine pesticide DDT, banned in 1972. Pesticide data indicate that DDT is still entering the local environment (Walton and Thelander 1991). The peregrine falcon has been proposed for de-listing by the U.S. Fish and Wildlife Service (USFWS). Peregrine falcons have recovered to approximately 20 percent of their historic breeding numbers in Marin County.

Bald eagles (*Haliaeetus leucocephalus*) have been observed to over-winter in the San Francisco Watershed. An occasional bald eagle is observed during the fall raptor migration by the Golden Gate Raptor Observatory. The bald eagle's drastic decline between 1947 and 1970 was attributed to certain organochlorine pesticides which interfered with their reproduction and caused direct mortalities. According to the USFWS, bald eagle populations appear to be stabilized, or are increasing in numbers. Threats to bald eagles in GGNRA could include the introduction of certain pesticides into the environment or food chain, and disruption of roosting or prey resources.

The **northern spotted owl** was listed as a threatened species by the USFWS on June 22, 1990 (USFWS 1990). Northern spotted owls are widely distributed in forested regions from southern British Columbia through Washington, Oregon, and northwestern California. They reach the southern limit of their range in Marin County, where they occur in Golden Gate National Recreation Area, Muir Woods National Monument, Point Reyes National Seashore, and other parts of the county. These three national park units began a joint systematic survey for spotted owls in Marin County in 1993. Preliminary results of these surveys indicate that the county may support the highest density of spotted owls nationwide (R.

Gutiérrez pers. comm.). A total of 83 known owl sites have been identified in the study area, including at least 52 pairs located in 1998.

Northern spotted owls are typically found in old- and mature second-growth forests, but in Marin County they reside in second- and old-growth Douglas fir, bishop pine, coast redwood, mixed conifer-hardwood, and evergreen hardwood forests. Preliminary pellet analyses indicate that spotted owls in Marin County forage primarily on dusky-footed woodrats as well other small mammals and forest-dwelling birds.

This isolated Marin County spotted owl population is subject to unique threats present in the region including: 1) urban development along protected-area boundaries, 2) intense urban recreational pressures, 3) increased controlled burns and wild fires along the urban/wildland interface, 4) potential for catastrophic wildfires due to unnatural fuel buildup and spread of invasive species (Monterey pine, eucalyptus), 5) possible genetic isolation, and 6) range expansion of the barred owl (*Strix varia*).

The **marbled murrelet**, a federally threatened species, is extremely sensitive to disturbance, including noise and human activity, in the vicinity of nesting areas, which are found in forest stands with old growth characteristics. A few unverified inland sightings have been reported since 1990. Systematic surveys have been conducted in Muir Woods National Monument from 1997 to 1999; no murrelets have been detected within the old growth redwood forest. Marbled murrelets are infrequently seen in nearshore waters from mid-summer through winter. GGNRA is also assisting the CDFG to identify other suitable areas to survey in Marin County. Detection of breeding murrelets in Marin would be extremely significant as there is a geographical gap between breeding populations in San Mateo and Santa Cruz counties to the south, and Mendocino County to the north.

The **bank swallow** (*Riparia riparia*) colony at Fort Funston is the largest nesting colony of bank swallows in the San Francisco Bay Area. More than 700 burrows (approximately 40 to 50 percent of which are occupied) were present in 1997, although European starlings invaded the colony in the mid-1990s and displaced bank swallows from some areas of the colony. American kestrels predated on significant numbers of both adults and young during this period as well. Kestrel populations may be unnaturally elevated due to the abundance of cavities available in urban homes and buildings. The Fort Funston bank swallow colony suffered a significant set back as a result of severe storms and coastal erosion caused by El Niño conditions during the winter of 1998. Coastal erosion was also accelerated in this area during 1999. The colony was reduced to approximately 150 burrows (40 to 50 percent occupied) in 1998, but with very few starlings present. The colony shifted south from areas used earlier in the 1990s, with the potential for increased conflict with hang-gliders flying at Fort Funston.

Bank swallows migrate from South America to nest in the beach cliffs of Fort Funston and as both perching birds and migratory birds are protected by the Federal Migratory Bird Treaty Act. The nesting range of the bank swallow in California has declined by approximately 50 percent since 1900.

The Golden Gate Audubon Society has expressed concerns regarding threats to the Fort Funston bank swallow colony. Rock climbers have been observed rappelling through the active colony. People also frequently climb the cliffs in the vicinity of the colony and it is a favorite site for graffiti and name-carving in the sandstone. The sandstone bluff is extremely erodible. During Fourth of July festivities fireworks have sometimes been aimed at the colony site from the beach below (Murphy 1989). The beach is now closed in the bank swallow area on the Fourth of July with active enforcement of the closure. The site is also adjacent to the park's only approved hang-gliding area, but flight is prohibited near the colony during breeding season.

The **western snowy plover** (*Charadrius alexandrinus nivosus*), federally listed as threatened in 1993, winters on Ocean Beach in San Francisco from mid-July through early May. It is severely impacted by intense human use and off-leash dogs. An average of between 25 and 85 plovers have used the beach each winter since 1994, with higher numbers in years when beach width is widest, and lower numbers in years when severe winter storms and El Niño conditions result in a much narrower beach profile. A draft snowy plover management plan was prepared in 1997 and revised in 1998. The park established a snowy plover management area from Sloat Boulevard in the south to Stairwell 21 in the north along the O'Shaughnessey seawall, based on several years of monitoring data. Beginning in 1997 the park began enforcing NPS leash regulations within the snowy plover management area, terminated all sand movement activities, and limited park vehicle operation within the plover area during the time that plovers are present. Seven drownings occurred on Ocean Beach during 1998, necessitating changes in vehicle use patterns on the beach. The management plan will be revised again in 1999 and finalized to address changes in vehicle use practices.

The endangered **mission blue butterfly** inhabits Milagra Ridge in Pacifica, Sweeney Ridge in San Bruno, and portions of the Marin Headlands. The populations are threatened by loss of habitat due to development and trampling by excessive foot traffic, illegal off-road vehicles, non-native plant invasion, and some routine maintenance activities have resulted in habitat degradation and loss of butterflies within the park. Several butterfly habitat restoration projects are currently underway in the park involving non-native plant removal and native plant restoration.

The endangered **San Bruno elfin butterfly** (*Incisalia mossi bayensis*) occurs in GGNRA at Milagra Ridge in Pacifica. It is threatened by displacement of host and of nectar sources by non-native plant invasion, trampling by people, lack of proper fire management, and development.

The **Bay checkerspot butterfly** (*Euphydryas editha bayensis*) inhabits Edgewood Park in the San Francisco Watershed. It is threatened by development and non-native plant invasion.

The endangered **California least tern** (*Sterna antillarum browni*) does not nest in the park, but uses abandoned piers for roosting and nearshore waters for foraging. Recent proposals to increase ferry traffic within San Francisco Bay and to new locations in the park may affect roosting and foraging patterns.

The **southern sea otter**, a federally threatened species, occurs infrequently in GGNRA marine waters but sightings are increasing and a population of approximately 50 males now inhabits Fitzgerald Marine Reserve in northern San Mateo County. As the population rapidly expands northward, increased sightings and beached animals are expected. The southern sea otter population has been declining by 11 percent per year over the past three years due to unknown causes. It is believed that marine pollution, disease and commercial fisheries operations may be responsible for this alarming decline. The USFWS is currently considering changing the southern sea otter's status to endangered.

The federally threatened **Steller sea lion** (*Eumetopias jubatus*) was historically a frequent sight on Seal Rocks in San Francisco. The population in California has declined dramatically and they are now extremely rare even on the Farallones. One individual was recently observed at Pier 39 in San Francisco.

Humpback whales, federally endangered, are infrequently observed nearshore and occasionally wander into San Francisco Bay. Whale species have primarily been impacted by whaling activities in the past and by foreign countries that do not abide by international protections afforded most whale species.

The **salt marsh harvest mouse** (*Reithrondontysomys raviventris*), a federally endangered species, has been found during small mammal inventories at Rodeo Lagoon. This species is threatened by loss of habitat to development and filling of wetlands around San Francisco Bay.

The **San Francisco garter snake** has been listed as endangered by the USFWS and CDFG since 1967. This snake is endemic to San Mateo County, where it occurs in the San Francisco Watershed and a few other sites (USFWS 1985). Milagra Ridge is potential habitat for the San Francisco garter snake because of the presence of prey items and the historic occurrence of the garter snake in sag ponds along Skyline Road (Barry, pers. comm. 1999).

The current condition of the snake in the San Francisco Watershed is unknown and has resulted in threats from routine maintenance. If the snakes inhabit Milagra Ridge, they may be threatened by dogs, collectors, and the development of upland habitat on ridges north and east of Milagra Ridge.

The **California freshwater shrimp** is endemic to Marin, Sonoma and Napa counties, but only remains in portions of 16 coastal streams. Lagunitas Creek in Marin County contains the most viable population of the shrimp and it is the only site occurring on protected lands. The shrimp is threatened by water diversions on Lagunitas Creek, watershed erosion, stream sedimentation, riparian vegetation removal, agricultural development, grazing, and urbanization.

The threatened **California red-legged frog** is found at several park locations within the San Francisco peninsula and in Marin County. It has been extirpated from 70 percent of its former range. Threats to this species include urban encroachment, construction of reservoirs and water diversions, introduction of non-native predators and competitors, livestock grazing, and habitat fragmentation.

The endangered **tidewater goby** currently lives in Rodeo Lagoon. It is the only remaining location with tidewater gobies within the greater Bay Area counties. Historic records indicate that the goby occurred in at least 9 other locations within the San Francisco Bay Region, such as Lake Merced and Corte Madera Creek (Swift et al. 1989). Threats to this species include loss of habitat through excessive sedimentation, poor water quality, and non-native competitors.

The threatened **steelhead trout** (Central California Coast Evolutionarily Significant Unit [ESU]) is found in many perennial coastal streams within the park. In addition, the offshore waters along the Pacific coast as well as estuarine areas in San Francisco Bay and Tomales Bay provide rearing habitat for steelhead. Human threats to this species include degradation of spawning gravels, habitat simplification, and water diversions.

The threatened **coho salmon** (Central California Coast ESU) is found in Lagunitas, Olema, and Redwood Creek watersheds. Juveniles are often found in deep pools with abundant cover in the form of undercut banks, overhanging vegetation, and woody materials. In addition, the offshore waters along the Pacific coast as well as estuarine areas in Tomales Bay could provide rearing habitat for coho salmon. Human threats to this species include degradation of spawning gravels, habitat simplification, and water diversions.

Plants

Sensitive plant species are subject to a variety of threats. Table 3 identifies the threats to each and the management actions that are currently being undertaken.

Table 3. Sensitive Plant Threats and Recovery Actions

Common Name	Scientific Name	Federal Listing	State Listing	CNPS	Annual Monitoring	Threats	Management Action Underway
San Mateo thornmint	*Acanthomintha duttonii*	FE	SE	1B	yes	Maintenance activities	None
Coast rock cress	*Arabis blepharophylla*		CSC	4	yes	Non-native species	Protection, non-native species removal
Tamalpais manzanita	*Arctostaphlyos hookeri* ssp. *montana*			1B	yes	Fire suppression and non-native species	None
Presidio or Raven's manzanita	*Arctostaphylos hookeri* ssp. *ravenii*	FE	SE	1B	yes	Non-native species, significant loss of habitat, one remaining parent plant	Protection, research, non-native species removal
Montara manzanita	*Arctostaphylos montaraensis*		CSC	1B	yes	Fire suppression	None
Marin manzanita	*Arctostaphylos virgata*		CSC	1B	yes	Douglas fir encroachment/fire suppression	Non-native species Removal
Oakland star-tulip	*Calochortus umbellatus*			4	yes	Grazing, non-native species	None
Tiburon Indian paintbrush	*Castilleja affinis* ssp. *neglecta*	FT	SE	1B	yes	Grazing, non-native species	None
Indian paintbrush	*Castilleja subinclusa* ssp. *franciscana*			4	yes	Grazing, non-native species	None
Point Reyes ceanothus	*Ceanothus gloriosus gloriosus*			4	yes	Douglas fir encroachment/fire suppression	None
Glory brush	*Ceanothus gloriosus* var. *exaltatus*			4	yes	Douglas fir encroachment/fire suppression	None
Bolinas or Mason's ceanothus	*Ceanothus masonii*	FT	CSC	1B	yes	Douglas fir encroachment/fire suppression	Protection, non-native species removal
San Francisco spineflower	*Chorizanthe cuspidata* ssp. *cuspidata*		CSC	1B	yes	Non-native species, reduced natural dune process	Protection, non-native species removal, habitat creation
Franciscan thistle	*Cirsium andrewsii*			4	yes	Non-native species	Protection, non-native species removal, research, habitat creation

Common Name	Scientific Name	Federal Listing	State Listing	CNPS	Annual Monitoring	Threats	Management Action Underway
Fountain thistle	*Cirsium fontinale fontinale*	FE	SE	1B	yes	Maintenance activities, non-native species	None
Presidio clarkia	*Clarkia franciscana*	FE	SE	1B	yes	Non-native species, significant reduction in habitat	Protection
Point Reyes salt marsh bird's beak	*Cordylanthus maritimus* ssp. *palustris*		CSC	1B	no	Unknown	None
Western leatherwood	*Dirca occidentalis*			1B	yes	Maintenance activities	None
California bottle-brush grass	*Elymus californicus*		CSC	4	yes	Non-native species	Non-native species removal
Tiburon buckwheat	*Eriogonum luteolum* var. *caninum*		CSC	3	yes	Non-native species	None
San Mateo wooly sunflower	*Eriophyllum latilobum*	FE	SE	1B	yes	Non-native species, maintenance activities	None
San Francisco wallflower	*Erysimum franciscanum*		CSC	4	yes	Non-native species	Protection, non-native species removal
Fragrant fritillary	*Fritillaria liliacea*		CSC	1B	yes	Grazing, non-native species	None
Dune gilia	*Gilia capitata* ssp. *chamissonis*			4	yes	Non-native species, reduced natural dune process	Protection, non-native species removal, habitat creation
San Francisco gumplant	*Grindelia hirsutula* var. *maritima*		CSC	1B	yes	Non-native species	Protection, non-native species removal
Marin dwarf flax	*Hesperolinon congestum*	FT	ST	1B	yes	Non-native species, significantly reduced habitat	Protection, non-native species removal
Wedge-leaved or Kellogg's horkelia	*Horkelia cuneata* var. *sericea*		CSC	1B	no	Unknown	None
Crystal Springs lessingia	*Lessingia arachnoidea*			1B	yes	Non-native species, maintenance activities	None
San Francisco lessingia	*Lessingia germanorum*	FE	SE	1B	yes	Non-native species, reduced natural dune process	Protection, research, non-native species removal, habitat creation
San Mateo tree lupine	*Lupinus eximius*		CSC	3	yes	Non-native species, maintenance activities	None

Common Name	Scientific Name	Federal Listing	State Listing	CNPS	Annual Monitoring	Threats	Management Action Underway
Santa Cruz Island bush mallow	*Malacothamnus fasciculatus* var. *nesioticus*	FE	SE	1B	yes	Non-native species, maintenance activities	None
White-rayed pentachaeta	*Pentachaeta bellidiflora*	FE	SE	1B	yes	Non-native species, maintenance activities	None
Choris' popcornflower	*Plagiobothrys chorisianus* var. *chorisianus*			3	no	Unknown	None
Dolores or San Francisco campion	*Silene verecunda* ssp. *verecunda*		CSC	1B	yes	Non-native species, reduced natural dune process	Protection, non-native species removal, habitat creation
Santa Cruz microseris	*Stebbinsoseris decipiens*		CSC	1B	no	Unknown	None
Tamalpais jewelflower	*Streptanthus glandulosus* var. *pulchellus*		CSC	1B	yes	Non-native species	None
San Francisco owl's clover	*Triphysaria floribunda*		CSC	1B	yes	Non-native species, significantly reduced habitat	Protection, non-native species removal

KEY TO TABLE 1

FEDERAL LISTING STATUS

FE = Federally Endangered
FT = Federally Threatened

STATE LISTING STATUS

SE = State Endangered
ST = State Threatened
CSC = California Species of Special Concern (California Department of Fish and Game 1998)
CNPS: California Native Plant Society status
1A = Presumed extinct in California
1B = Rare or endangered in California and elsewhere
2 = Rare or endangered in California, more common elsewhere
3 = Needs more information
4 = Plants have limited distribution
Watch List: CA/National and California - National Audubon Society
PIF: Partners-in-Flight
SCP: Species of Conservation Priority
CDF: California Department of Forestry

3.5 Wildlife Resources

While the park supports an extremely diverse array of wildlife species and their habitats, a broad range of forces threaten the viability of these wildlife populations and the habitats they depend upon. No corner of the park is untouched by human influence.

Park-Wide Resources

Threats to wildlife and their habitats throughout the park fall into a number of broad categories such as habitat fragmentation, non-native animals, human disturbance, domestic and feral animals, non-native plant invasion, environmental contaminants, wildland fire, hazard fuel reduction, etc. Brief discussions of these threats follow.

Habitat fragmentation, degradation and isolation are inherent features of parklands situated along the urban interface. As fragmentation and isolation of wildlife habitat increase with further development on lands surrounding the park, the park's importance as a refuge, and for providing corridors for wildlife populations, increases. Maintenance of biodiversity and viable wildlife populations are dependent on the park's ability to maintain and restore habitat corridors at the landscape level, within and beyond park boundaries.

Non-native animals identified as problem species within native wildlife habitat in the park include brown-headed cowbirds (*Molothrus ater*), wild turkeys (*Meleagris gallopavo*), European starlings (*Sturnus vulgaris*), peasows (*Pavo cristatus*), fallow deer (*Cervus dama*), feral hogs (*Sus scrofa*), and Norway and black rats (*Rattus norvegicus* and *R. rattus*).

Brown-headed cowbirds parasitize open-cup nests of birds. Neotropical migrants and riparian nesting birds are particularly susceptible. Cowbird parasitism is widespread throughout the park, but the level of parasitism and the lack of concentrated foraging areas make cowbird control unrealistic. Neotropical migrants are threatened by elevated predation levels (probably resulting from habitat modification), loss of habitat and parasitism. Wild turkeys were recently introduced into Marin County by the CDFG. Wild turkeys feed on a wide variety of foods including native frogs and native plants and seeds. Peacocks have similar habitat impacts. European starlings are cavity nesters that compete with and displace native species from limited nesting habitat. American kestrels (*Falco sparverius*), bank swallows (*Riparia riparia*) and other cavity nesters are impacted by the widespread occurrence of starlings.

The fallow deer population in Point Reyes and on GGNRA northern lands in the Olema Valley and on Bolinas Ridge continues to expand. No current population estimates exist and only very limited efforts to reduce the herd size have occurred over the last 5 years. Small to large herds are now regularly seen on ranch lands along Bolinas Ridge. Fallow deer may compete with native black-tailed deer for forage, transmit diseases, and modify native plant communities.

Feral hogs were widespread in the park during the 1980s but appear to have been successfully eradicated through hunting and trapping efforts by the NPS. Only a few unconfirmed sightings have been reported over the past 5 years. Feral hogs have potential to seriously degrade habitat and native animals populations through soil disturbance, uprooting of native plants, competition for foraging resources, particularly acorns, predation on small animals, and disease transmission. Feral hog populations could rapidly increase again at any time in Marin or San Mateo counties.

Norway and black rats are known to occur in various locations throughout the park, including Muir Woods, Alcatraz, Olema Valley and Marin Headlands. Rats prey on native wildlife and their young.

They were found preying on the Townsend's big-eared bat in Olema Valley, where steps were taken to discourage and exclude them from the maternity roost. They are also a threat to burrow-nesting birds (such as pigeon guillemots on Alcatraz) that leave their young unattended while the adults forage at sea. Black rats are excellent climbers and will take eggs and young out of nests in tall shrubs and trees. Rats also carry diseases and constitute a human health threat wherever they occur.

Isolated populations of red foxes (*Vulpes vulpes*) are known to occur in Marin and San Mateo counties but have not been confirmed in the park. They pose a serious threat to the viability of small mammal and ground-nesting bird populations where they occur.

Unnaturally elevated populations of native animals, including ravens and other corvids, raccoons and skunks, occur along the urban-wildlife interface where supplemental food sources are abundant. Raccoons and skunks may transmit diseases to people and pets, and exhibit nuisance behavior. Supplemental food sources and elevated small mammal populations (including domestic dogs and cats) may attract larger predators like mountain lions and coyotes to more populated areas with potential for unwanted conflicts.

Domestic and feral animals (cats and dogs) may transmit diseases to visitors as well as wildlife populations, prey on birds and other small mammals and invertebrates, dogs may hybridize with coyotes or experience aggressive territorial encounters with them. Domestic animals (leashed or unleashed) on trails and other parklands may displace wildlife from their native habitats, or harass, disturb or depredate a wide range of wildlife species, including shorebirds, black-tailed deer, and marine mammals.

Livestock grazing by cattle is permitted within the Olema Valley and along Bolinas Ridge. Limited grazing by horses occurs in the vicinity of horse stables within the park. Cattle grazing results in riparian habitat degradation, decline in numbers and diversity of small mammals and landbirds in all grazed habitats, and degradation of native grasslands. In one area of the park, native grasslands support large numbers of western harvest mice while adjacent non-native grasslands do not.

Park visitors and human disturbance impact park wildlife through a wide range of activities. Marine mammals are disturbed by tidepool study, boaters, clam diggers and aircraft overflights and off-leash dogs. They are also shot by commercial fishermen. Shorebirds, waterbirds and seabirds are disturbed by similar activities. Illegal bike trails and social trails destroy wildlife habitat and result in increased disturbance to wildlife in undeveloped areas of the park. Gang activity (nighttime graffiti in historic structures) may disrupt night roosts of sensitive bat species.

Poaching likely occurs in more remote areas of the park, resulting in disturbance and loss of wildlife.

Pathogens of unknown origin, likely both introduced and native, affect marine mammals, birds, terrestrial wildlife, and wildlife habitat. Humans may represent a significant dispersal agent for many pathogens. Sudden death of tanoak disease threatens to kill tanoak trees throughout the park. This disease has been documented in Muir Woods and other areas of Marin County, as well as in Santa Cruz County to the south of the park. Acorns, largely from tanoaks, are a major food source for many terrestrial wildlife species including deer and woodrats which are important food sources for species higher on the food chain. A significant tanoak die-off would have serious repercussions for wildlife diversity and abundance on a landscape level within and around the park.

Non-native plant invasion by a wide variety of introduced species (Cape ivy, French broom, Scotch broom, eupatorium, pampas grass, non-native grasses, thistles, etc.) results in loss of hundreds of acres of

riparian, terrestrial and aquatic habitats that are critical to wildlife abundance and diversity throughout the park. The park's vegetation management program expends hundreds of thousands of dollars and volunteer hours on eradication of non-native plants and restoration of native habitats.

Continued park development and park operations impact wildlife as well as plant, water and soil resources. Facilities and trail maintenance and development frequently conflict with protection of sensitive wildlife species and habitat protection in areas like the Presidio, Fort Baker, Marin Headlands, Alcatraz, Muir Woods, Sweeney Ridge, and the Phlegar Estate. Park operations, programs and routine activities including road and trail maintenance, trail bridge construction, firearms qualifications, and concession operations potentially threaten sensitive wildlife resources, particularly during mating and nesting season.

Wildland fire and hazard fuel reduction programs also impact native wildlife and their habitats. Catastrophic wildfires may occur as a result of more than a century of fire suppression and fuel buildup. Vast areas of wildlife habitat may be impacted, directly and indirectly, as a result of events like the 1995 Vision Fire at Point Reyes. Non-native plant invasions have been especially aggressive following wildfires in this region. Heavy equipment used for fire suppression may compact soils and alter drainage patterns and wildlife habitat. Large numbers of native wildlife are killed or displaced as a result of catastrophic wildfires. Hazard fuel reduction programs, including prescribed burning and habitat modification, are designed to prevent such catastrophic losses of park resources. They, in turn, result in habitat modification and direct and indirect effects to wildlife and their habitat. Careful interdisciplinary planning and proper timing of activities are critical to protecting existing habitat values.

Coastal erosion and shoreline stabilization result in natural and human-induced impacts to wildlife habitats in the park. Coastal erosion, which is affecting bank swallow, shorebird, and harbor seal habitat availability, may be accelerated due to global warming. Shoreline stabilization projects to protect property adjacent to the park may alter coastal processes and sand transport along Ocean Beach, that in turn affect habitat for migratory and wintering shorebirds and snowy plovers. Shoreline stabilization projects, sand maintenance, and repair of outfalls along Ocean Beach require use of heavy equipment on the beach that may disrupt normal activity patterns of roosting and foraging shorebirds, terns and gulls.

Environmental contaminants, such as DDE, polychlorinated biphenyls (PCBs), heavy metals, residual DDT, petroleum products, asbestos and lead-based paint, affect the health and reproductive success of numerous park wildlife species such as harbor seals, peregrine falcons, black-crowned night-herons, snowy plovers, and seabirds. Many historic structures in the park, often in areas inhabited by native wildlife, are contaminated with lead-based paint, asbestos, and petroleum products in abandoned fuel lines. Oil spills have affected the entire shoreline of the park, both within San Francisco Bay and along the outer coast. Numerous species of wildlife, particularly water birds, shorebirds and harbor seals, have been oiled and injured or killed in these events. Poor water quality may affect aquatic and terrestrial animals that live or forage in contaminated waters.

Light pollution from excessive or unshielded night-lighting within the park, and cumulative urban light sources, affect the nighttime habitat and habits of park wildlife. Darkness provides refuge and protection for wildlife resting or hunting at night. Wildlife may be more vulnerable to predation and behavior patterns may be altered where light pollution affects their habitat.

Island Resources

Alcatraz is a 21-acre island in the middle of San Francisco Bay that receives 1.4 million visitors a year. Alcatraz represents the extreme of potential, impending, existing and cumulative internal and external

threats and pressures on park wildlife resources. The island's historic structures are in urgent need of structural stabilization to address human health and safety issues. Stabilization of historic structures on the island is a challenging task that will take years or decades to complete. Many construction activities are constrained by the prolonged colonial bird-nesting season on the island that lasts from February to September. An Environmental Impact Statement is in preparation to address threats to the island's wildlife resources from the range of construction activities expected over the next 5 to 10 years.

Other internal threats and pressures on Alcatraz wildlife include increased visitation, expanded hours of operation, night lighting, special events, expanded access to more areas of the island, accessible tram routing, access to closed areas during breeding season for construction projects, helicopter use for park operations, film production including pyrotechnic displays, Norway rat predation, common raven predation, food service for special events, and toxic contaminants within the island landscape. Some of these threats are being addressed through ongoing Norway rat control efforts, cleanup of contaminants, increased wildlife monitoring, and implementation of additional wildlife protection measures. Existing disturbance monitoring data are inadequate to predict the consequences to wildlife of many proposed activities.

The GGNRA has documented a wide range of external threats to Alcatraz wildlife resources. Most of these involve disturbance to wildlife from activities too close to breeding bird colonies. Documented disturbance sources include: aircraft overflights (civilian and military helicopters, air tours), commercial and sport fishing boats, dredge spoil barges, recreational boaters (kayakers, personal watercraft, sailboats, motorized boats), illegal boat landings, and un-permitted events offshore (laser light shows, fireworks displays, firing of cannons). Other existing or potential external threats include: disposal of dredge spoils within the park boundary, toxic contaminants in San Francisco Bay foraging resources, oil spills, and proposed removal of submerged rocks (that may support valuable foraging resources), to improve harbor safety. The park has initiated outreach efforts and protection measures and is developing strategies for addressing disturbance from external sources.

3.6 Marine Resources

Non-native marine invertebrates are present within park boundaries. The San Francisco Bay-Estuary has 212 species known to have been introduced and the dubious distinction of having the most non-native aquatic species in North America (Cohen and Carlton 1995). The introduced species present in the park include (but are not limited to) Asian clam *(Corbicula fluminea)*, yellowfin goby (*Acanthogobius flavimanus*), and Sargasso weed (*Sargassum muticum*). The yellowfin goby has been identified as a potential threat to the listed tidewater goby. Many kilometers of bay shoreline have been eroded due to the activity of a boring and burrowing isopod, *Sphaeroma auovanum.* The isopod weakens clay banks, dikes and levees, facilitating their removal by wave action. The greatest impact results from non-native species competition with native species (Carlson 1979).

Adverse visitor impacts on various intertidal areas is a threat. The accessibility of rocky intertidal areas to an urban center invites visitor usage can result in visitor-related impacts to the habitat. Changes in many of the park's intertidal areas have taken place and will continue to do so, because of the lack of basic marine resources information and lack of protection. Visitors to the intertidal zone can impact the habitat in many ways:

1. Damage to the adhesive organs of starfish and snails occurs when people remove them from surfaces.

2. Damage to sedentary animals (such as barnacles and mussels) and to plants that occurs when they are removed often destroys the entire organism.

3. Damage to organisms that rely on rocks for habitat and protection results from turning over rocks and not replacing them in their original position.

4. Removal of empty shells as souvenirs eliminates potential homes for other organisms, the most conspicuous of these being the hermit crab.

5. Damage occurs from trampling by large groups throughout intertidal areas, particularly at low tide.

6. Overzealous collecting and handling may eliminate uncommon species.

7. Litter poses a threat to unique resources in intertidal areas. The stepladder tidepools of Bird island have been contaminated with fishermen's debris, cardboard, cigarettes, beer cans, newspapers and plastic lids (Chan 1974). Dr. Johnson Wang has recommended that littering be more actively discouraged at Rodeo Beach due to the tidewater goby, a federal candidate for listing, that resides in Rodeo Lagoon near the sand bar.

Sport and commercial fishing can affect the reproductive success of herring, bass and anchovies in the bay and in the Gulf of the Farallones, which in turn would affect the many birds and mammals dependent on these resources. A total of 18.7 million pounds of fish was harvested by commercial operations in 1984 (BCDC 1986). An active commercial fishery for herring occurs in waters owned and leased by the park along the San Francisco and Marin peninsula shorelines.

Intertidal fishing and collection have an adverse impact on the ecology of these habitats. Public access for pier fishing is available at Fort Point, Fort Mason, Alcatraz, Lime Point, and Fort Baker. CDFG regulations allow the removal of specified quantities of mussels, sea urchins, abalone, eel, rock crabs, herring eggs and surf fish from the intertidal zone.

Herring lay their eggs on seaweed, which can be legally collected. Observations of mussels and abalone in frequently visited sites are not abundant, and the pressure of hunters has probably contributed to the disappearance of the razor clams from Stinson Beach. Repeated dives in 1974 documented that there were no abalone at Muir Beach or Bird Island, and only sparse numbers at Pirates' Cove and Slide Ranch. "Game" species are an integral component of the shoreline ecology. Over-fishing of game species such as clams, abalone, urchins and mussels may lead to their decline in shoreline waters (Chan 1974).

Game regulation enforcement is not adequate. Park rangers, park police, and natural resources personnel have observed poaching at several locations and have expressed concern regarding inadequate game regulation enforcement. Although it is illegal to take Dungeness crabs from San Francisco Bay, intentional and uninformed poaching of crabs from piers is an ongoing problem (CDFG 1999).

Dungeness crab are especially vulnerable to illegal fishing because they migrate along the bottom near piers. Much illegal crabbing occurs at night and the lack of lights and enforcement at the piers hinder nighttime enforcement (CDFG 1999). Dungeness crabs are also taken by people who cannot distinguish them from other market crabs.

Global warming will have an impact on marine and terrestrial habitats. The temperature will rise, but precipitation will remain the same, creating drier conditions for plants. More stress on plants may lead to a reduction in associated animal populations (The Bay Watcher 1989).

Rise in sea level over the next century will result from global warming (The Bay Watcher 1989). Rising sea levels mean rising bay levels and resultant changes in GGNRA's natural resources. Everything from phytoplankton to marine mammals could be affected. Some of the potential impacts that can be foreseen include: a reduction in primary productivity due to saltwater intrusion in the productive shallows of San Pablo and Suisun bays and the flooding of marshes and impacts on Pacific flyway and local waterfowl. The result could be a general decline in most bay species of fish, shellfish, marine mammals and birds.

3.7 Air Resources and Night Sky

Air resources and night sky are affected by changes in **air quality**. Aerometric and meteorological data are collected by the Bay Area Air Quality Management District (BAAQMD). They have 29 sites in the greater Bay Area, two of which are in San Francisco, and one of which is in San Rafael. In addition, the BAAQMD monitors air quality in a tower network of 28 different Bay Area sites. One of these sites is at Fort Funston and a second is on Mt. Tamalpais. As a result, GGNRA has access to air quality data within and near the park. According to the BAAQMD, the condition of the air in the park is "good" and no known acid deposition is occurring due to the local climatic factors. The BAAQMD meets all federal air quality standards except 1-hour ozone, and annual and 24-hour particulate matter 10 microns in diameter (PM_{10}).

Poor air quality days in the Bay Area can create severely impaired visibility. The sweeping views of the smog blanket detract from the visitor's experience. Some individuals may need to avoid outdoor activity or take special health precautions. In addition, negative impacts to the park's ecosystems may occur due to periods of poor air quality. The park does not actively participate in the BAAQMD's "Spare the Air" program, which is designed to reduce air quality impairment during the smog season.

While high open areas in the park may provide opportunities to view the night sky, most of these locations are subject to light pollution from the surrounding Bay Area. Lighting within and adjacent to the park also reduce the darkness of the night sky. Data have not been collected to evaluate the darkness of the sky within GGNRA, nor has a plan been developed to protect or improve night sky viewing.

Wildlife habitat is impaired by **artificial lighting**. Park lighting, lights from adjacent property, and the overall sky glow from the Bay Area contribute to the nighttime degradation of habitat. The park does not have a plan to address preservation and restoration of dark habitat.

The park's **urban setting** threatens protection and restoration of natural quiet. Aircraft, watercraft and road traffic outside the park all contribute to noise levels within the park. Noise generated inside the park includes not only visitor noise (such as vehicles, dogs, and voices), but noise generated by park staff (vehicles, power equipment, and voices). Baseline studies should be done to quantify ambient noise within the park, and the value of natural quiet should be incorporated into park planning, operations and interpretation.

4 GGNRA NATURAL RESOURCE PROGRAM

The magnitude and visibility of the threats to natural resources at GGNRA require the combined efforts of all park and community resources to properly care for the multitude of resource values. The staff of the Division of Natural Resources Management and Research serves as natural resource project managers and as consultants to the park on issues regarding each specific expertise. This professional staff works as an interdisciplinary team. The blending of disciplines and skills allows for an ecosystem approach to problem solving. The focus of the program is to promote the health and vitality of the natural resources and the systems/processes they require.

All other divisions also contribute to natural resources management. The Division of Maintenance controls erosion and vegetation throughout the park in trail and road projects and monitors resource conditions daily, with other routine maintenance responsibilities. Resource and Visitor Protection staff ensures that recreational users do not abuse sensitive sites, and they report resource damage. The Interpretive staff facilitates community and visitors awareness of the fragile resources and the actions that the park takes to preserve and restore them.

Alliances with thousands of volunteers provide the experience of hands-on resource preservation projects and produce field results that would otherwise be impossible, given limited staffing. The Golden Gate National Parks Association provides the vehicle to tap these community resources through staff and outreach programs. The Golden Gate National Parks Association also provides professional grant writing, planning, and natural resource project support.

The Division of Natural Resources Management and Research consists of the following positions: Ecologist, Hydrologist, Natural Resources Management Specialist (Wildlife), Integrated Pest Management Specialist, Aquatic Ecologist, two Plant Ecologists, two Natural Resources Management Specialists (Vegetation), and a Geographic Information System Specialist.

4.1 Objectives of the Natural Resource Program

The program is complex, and spans many disciplines and divisions. The goals of the program are generally to know, restore and maintain the natural resource values of the park. More specifically, the following goals are identified:

1. Increase basic knowledge of the park's natural resources, to address threats and restore natural conditions.

2. Practice an interdisciplinary, ecosystem management approach to natural resources management and protection, transcending park boundaries where possible.

3. Strengthen community awareness and participation in resources management by interdivisional and interdisciplinary structure.

4. Pro-actively identify and manage potential conflicts between natural resources and human uses through data collection, education, and development of management alternatives to protect and restore resources where necessary.

5. Protect or restore and monitor the natural biological diversity of the park's ecosystems including but not limited to threatened, endangered, and sensitive species, and their habitats.

6. Improve water quality in the park through identifying and mitigating point and non-point pollution, identifying and mitigating illegal and unnecessary water withdrawals, restoring damaged water habitats and monitoring water quality attributes in sensitive park streams.

7. Prevent loss of native species and habitats by eliminating or controlling non-native and feral species populations.

8. Integrate natural resources data collection and management with GIS technology and standardize systems.

The Natural Resources Program has a global view of natural resources conservation and incorporates it into the planning and day-to-day operations. Sustainable design and innovative technologies broadens the natural resources program to a global focus. Water conservation, recycling, use of recycled products, integrated pest management and the reduction of pesticides are all embodied in the natural resource program. This vision is reinforced through the vision of the Presidio *General Management Plan Amendment*.

4.2 Inventory and Monitoring (Vital Signs) — an Integrated Program

This program will be implemented within the next 5 years if funding and staffing are available. A Vital Signs Plan will be an addendum to this document.

4.3 Restoration — an Integrated Program

Restoration of natural systems is a major element of the natural resources management program of the park. The NPS and the GGNRA partner with community volunteers and other agencies to incorporate a variety of ways to enhance natural processes through habitat restoration. Projects vary from watershed-wide programs that include many facets and agencies to smaller projects that focus on revegetation but provide valuable habitat for a rare species such as mission blue butterfly, or general wildlife services. Although this kind of project may appear to focus on vegetation, wildlife volunteers and interns would monitor the project to assess the way the plant community and associated wildlife evolve. Most of these simple projects are overseen by the vegetation program and are reviewed in Section 4.6, even though wildlife interns and volunteers are coordinated with an integrated approach.

More complicated watershed programs are identified here. They include hydrologic, aquatic, vegetative and wildlife habitat restoration as well as more indirect ecological conservation and restoration such as sustainable practices and transportation issues. Often these issues are coordinated by watershed and involve the following:

1. Long-term multifaceted projects both within and beyond park boundaries.

2. Day-to-day project awareness, communication and integration.

3. Integration into other park operations.

4. Integration outside park boundaries.

5. Water conservation, recycling, sustainable design.

4.3.1 Redwood Creek Watershed

This watershed crosses jurisdictional boundaries of California State Parks, Marin Municipal Water District, the Muir Beach Community and Green Gulch Farm, in addition to GGNRA. The watershed itself is unique with towering redwood habitats, rare salmon migrations, monarch butterflies, spotted owls and aquatic habitats. The potential for improving the status of sensitive ecosystems in this watershed are great; the threats to the system are great as well. Water diversions, erosion, stable operations, development, non-native plant invasion, farming, habitat fragmentation and degraded water quality all weaken the integrity of the watershed ecosystem.

An interdisciplinary, interagency cooperative working group was created in 1998 to facilitate watershed management. It represents an alliance of private property owners and land management agencies for sensitive and sustainable management operations.

Project statements directly related to this project include:

GOGA-N-005	Redwood Creek Watershed Restoration Project
GOGA-N-032	Old Growth Forest Species Protection
GOGA-N-048	Water Quality Monitoring Program
GOGA-N-081	Coho Salmon and Steelhead Preservation and Restoration
GOGA-N-082	Control of French Broom
GOGA-N-002	Survey and Mitigate Erosion
GOGA-N-012	Big Lagoon Restoration
GOGA-N-020	Inventory and Monitor Aquatic Resources
GOGA-N-001	Control Alien Plant Species
GOGA-N-016	Revegetation and Nursery Management

4.3.2 Rodeo Lagoon Watershed

Rodeo Lagoon is the only estuarine resource which has its watershed completely within the park boundary. A comprehensive restoration project for the lake, lagoon, and watershed environs is necessary. Actions of this project will include: monitor lagoon fish community; investigate the effects of poor water quality on ecology of Rodeo Lagoon; monitor and mitigate water quality and erosion, inventory and monitor other sensitive species, restore habitat and correct wildlife disturbance problems. Several project statements will be implemented to begin to accomplish this goal:

GOGA-N-180.001	Tidewater Goby Research (Investigation of poor water quality on the ecology of Rodeo Lagoon, Marin County, California)
GOGA-N-019.000	Tidewater Goby Monitoring
GOGA-N-002.000	Capehart Quarry
GOGA-N-004.000	Mission Blue Butterfly Habitat Restoration

4.3.3 Lobos Creek Restoration

The Lobos Creek Valley is identified as "Nature's Quiet Refuge" in the *General Management Plan Amendment* for the Presidio (NPS 1994). Lobos Creek provides water to the Presidio as well as to four native plant communities that are adjacent to it. The creek is to be restored as a naturally flowing stream and the valley preserved as a wild area. Plant habitats along the creek and in the adjacent dunes that house rare plants are to be restored. The cultural forest in the area will be preserved. The vision is to provide opportunities to learn about natural systems and sensitive human use of resources. Therefore visitor access must be accommodated conservatively. Threats in the area include: water diversion

management, water quality impacts from the surrounding urban area, visitor recreation impacts, non-native plant invasion, past land use practices such as tree plantings, dredging of the creek, construction of a ball field and a road and sewer management.

4.3.4 Bolinas Ridge Range Management

GGNRA range management consists of three horse stables, a small range of goats and sheep at Slide Ranch, and a set of cattle ranges that are administered by Point Reyes National Seashore. Range practices impact the hydrology and soils by vegetation removal, compaction, and nutrient changes from manure and urine. Water is retrieved for cattle consumption, often by wells, lowering the water table. Native wildlife is affected by grazing and recent park surveys have found that wildlife biodiversity is decreased in grazed areas.

The strategies to remedy these issues vary. Horse stable issues are addressed through the stable permits and long-term site planning. The Slide Ranch site plan includes range management. The northern grazed lands administered by Point Reyes National Seashore will be jointly managed with the seashore. A Range Management Specialist on the Point Reyes staff is implementing the *Range Management Guidelines* for Point Reyes and the park's northern lands. GGNRA staff will assist in implementing those guidelines when appropriate. Initial focus will be put on overgrazing, riparian protection, water management and cultivated areas. Quarterly meetings with Point Reyes Natural Resource staff will facilitate this management effort.

Guidance for this management is led through the Range Management Guidelines and identified in Project Statement GOGA-N-024.

4.3.5 Water Conservation, Recycling, Sustainable Design

The projects under this heading address many ideas expressed in the NPS's publication *Guiding Principles of Sustainable Design*. The goal of projects under this category is to create within GGNRA a model of environmental sustainability. This can be achieved by improving energy efficiency, using environmentally sensitive materials, conserving water, recycling materials and serving as a model of stewardship and wise use of global resources.

Threats associated with not developing this program include lowered water tables, polluted air, loss of topsoil, deforestation, extinction of plants and animals, overexploitation, solid waste and landfill overflow, and general degradation of our environment.

Strategies for addressing these threats are all based on reducing consumption. Specific water conservation strategies include using low-flow toilets (toilets are the largest household water use), developing efficient irrigation systems, using drought-tolerant landscaping, hooking up to reclaimed water systems, identifying leaks in piping, and educating water users. Another strategy is to develop demonstration areas at locations such as the Presidio Golf Course, Muir Beach, and Fort Mason. Tenants and other park partners should be required to comply with this program.

4.3.6 Day-to-Day Project Awareness

Ongoing interdivisional communication is necessary to ensure the best management practices in natural resources management. Personal communications and daily access to phones, radios, electronic mail and personal contact is critical to an integrated, unified program. Intradivisional communications through posting of activities and achievements in Buildings 1061, 102 and 201 are encouraged. Protection,

Maintenance, and the Golden Gate National Parks Association are continually updated about changes in threats and resource condition through the vehicles noted above.

The Division of Interpretation is the conduit between the natural resources branch and the public. Continuing information exchange between interpretation and natural resource management regarding ongoing and one-time projects will promote a community of support and understanding of natural resource issues and management.

Projects throughout all divisions of the park are communicated through a Project Review process. The Division of Planning and Compliance is responsible for the review of projects. The Division of Science and Natural Resources participates in the Project Review process. In this way the possible impacts of any initiated project can be mitigated at the planning stage.

4.3.7 Integration Outside Park Boundaries

The staff works with federal, state and local agencies to ensure an ecosystem approach to natural resource problems. Land manager groups meet to discuss mutual concerns and to coordinate strategies for problem solving. A GGNRA representative sits on the Bolinas Lagoon Technical Advisory Committee and on the Tomales Bay Advisory Committee. A recent agreement with California State Parks initiates a joint management program on state park lands throughout the park.

Projects outside park boundaries come to the natural resource staff through the Branch of Planning and Compliance. Interdisciplinary teams are generally assigned through Project Review to review the projects. Natural resource concerns are addressed through that process.

4.4 Wildlife Program

Fifty-three terrestrial wildlife species occurring within the park are federally or state listed, proposed for federal listing, or are state or federal species of concern. A major emphasis of the park's wildlife program is to inventory, monitor, protect and restore the park's sensitive wildlife resources at the population, watershed or ecosystem level. These efforts are often undertaken on a cooperative basis with adjoining state and national parks and local land management agencies. Additional aspects of the park's wildlife program include resolution of human/wildlife resource conflicts, monitoring and control of feral and non-native animal populations and associated impacts to native wildlife and ecosystems, and wildlife data management.

Additional non-NPS components of the park's wildlife program include the Golden Gate Raptor Observatory, funded by the GGNPA, and the Golden Gate Field Station of the USGS Biological Resources Division's California Science Center.

The following projects detail GGNRA's strategies for addressing major threats to the park's wildlife resources and for achieving its wildlife program objectives.

4.4.1 Western Snowy Plover Protection and Monitoring

Ocean Beach has been a popular recreation area in the midst of the city of San Francisco for more than a century. Ocean Beach is also home to the western snowy plover (*Charadrius alexandrinus nivosus*), whose numbers have been greatly reduced in recent years, primarily as a result of habitat loss. The U.S. Fish and Wildlife Service (USFWS) listed the Pacific coast population of this diminutive shorebird as a "threatened" species in 1993.

Between 15 and 85 non-breeding snowy plovers live on Ocean Beach for 10 months of the year. They are subjected to intense recreational pressure and disrupted by off-leash dogs, and may be impacted by GGNRA and City and County of San Francisco (CCSF) operations including vehicle patrols and shoreline stabilization projects. The park has developed a draft management plan that addresses all activities with the potential to adversely affect snowy plovers on Ocean Beach and prescribes measures to minimize those impacts. The proposed management actions are in addition to those measures already implemented, such as enforcement of existing NPS leash regulations and changes in operation of heavy equipment. Snowy plovers occur from south of Fulton Street in the north, to Sloat Boulevard approximately 2 miles to the south.

Ocean Beach today represents a highly constructed and manipulated beach environment influenced by a combination of natural processes and human-induced influences on those natural processes. Little historical information is available on snowy plover use of Ocean Beach. It probably nested on the beach before development and extensive habitat alteration, but no records document actual nesting. Statewide censuses of wintering snowy plovers were conducted in California and Oregon by Point Reyes Bird Observatory volunteers between 1979 and 1985. Ocean Beach was surveyed 26 times over that period, yielding annual median counts of from 2 to 14 snowy plovers, with the wintering population estimated to be 14 plovers in San Francisco County (all on Ocean Beach). Maximum counts each year ranged from 4 to 16 plovers.

Following the listing of the western snowy plover as a threatened species in 1993, the park implemented a twice-weekly monitoring program with the following objectives:

1. Determine the current and long-term population status and trend in snowy plover use of Ocean Beach;

2. Determine the spatial distribution of snowy plovers on Ocean Beach;

3. Determine current levels and patterns of use by people and dogs on Ocean Beach;

4. Document current levels of disturbance, from all sources, to snowy plovers on Ocean Beach; and,

5. Document changes in behavior by people and dogs, and changes in disturbance levels following implementation of snowy plover protection measures.

Monitoring protocols are described in the park's Snowy Plover Monitoring Plan. Results from the first two years of the monitoring program are detailed in a monitoring report. Some of the findings are described below.

Surveys conducted by Point Reyes Bird Observatory, GGNRA, and an interested citizen between 1988 and 1996 observed annual median counts of from 20 to 40 snowy plovers, for a mean annual median of 28 snowy plovers for the entire period. Maximum counts each year ranged from 38 to 85 birds during this period. Snowy plovers were found on Ocean Beach from early July through mid-May, but none were present during the height of the breeding season between mid-May and July 1.

The 100 percent increase in the number of snowy plovers between the early 1980s and early 1990s correlates well with a period of beach widening and beach nourishment between 1985 and 1992. Beach profile and shoreline position data indicate an erosional trend occurred in the 1970s and early 1980s, resulting in a relatively narrow beach profile during that period. In 1992, Ocean Beach was near its historic widest, largely due to human activity. More suitable plover habitat appears to be available when

the beach is wider. Beach width has narrowed considerably since 1992 with a corresponding decline in the number of plovers using Ocean Beach. Snowy plover numbers dropped to a maximum of 25 to 35 in 1998 and 1999, following two winters of severe storms and coastal erosion. Other factors that probably influence the annual fluctuations in the wintering population of snowy plovers at Ocean Beach include loss of habitat in San Francisco Bay (e.g., changes in salt evaporation pond management) and changes in habitat conditions elsewhere.

The park also conducted a disturbance study of snowy plovers on Ocean Beach from 1994 to 1996 that documented that beach users with off-leash dogs disturbed plovers at a greater frequency than users without dogs, and that plovers were disturbed at greater distances by users with dogs.

A snowy plover management plan is being developed, based upon findings of the long-term monitoring program. Though not finalized, all elements of the plan have been implemented. The advent of seven drownings on Ocean Beach during the summer of 1998 led to changes in the public safety program on the beach and an increase in vehicle patrols during the warmest months of the year. These changes, and their impact on snowy plovers, are currently being addressed and added to the management plan.

The specific objectives of the snowy plover management plan are to:

1. Provide background information on public use, and GGNRA and CCSF operations that may affect snowy plovers and their habitat on Ocean Beach.

2. Recommend management actions that will prevent and minimize disturbance to snowy plovers on Ocean Beach, while continuing to provide for compatible recreational experiences for the local community and visiting public.

3. Recommend management actions that will prevent and minimize snowy plover habitat degradation, and promote long-term protection and enhancement of snowy plover wintering and migratory shorebird habitat.

4. Provide for protection and accessibility of GGNRA and CCSF resources, facilities and infrastructure in a manner compatible with the long-term protection of snowy plover wintering and migratory shorebird habitat on Ocean Beach.

5. Ensure public safety.

Additional changes may be required if Ocean Beach is added to snowy plover critical habitat. GGNRA's draft management plan is considered a model by USFWS and the recovery team for management of wintering snowy plover habitat. USGS Biological Resources Division is also modeling a research project, Science-Based Recovery Goals for Wintering Snowy Plovers, after the disturbance monitoring program conducted by NPS at Ocean Beach.

Project statements related to snowy plover monitoring and protection include:

GOGA-N-090	Western Snowy Plover Management
GOGA-N-018	Monitor Beach Erosion
GOGA-N-025	Monitor Marine and Estuarine Resources
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-074	Avian Resource Inventory

4.4.2 Northern Spotted Owl Inventory, Monitoring and Protection

Golden Gate National Recreation Area, Muir Woods National Monument, and Point Reyes National Seashore began a joint systematic survey for northern spotted owls (NSOs) in Marin County in 1993. The surveys were designed to systematically inventory forested public lands within and surrounding national parklands for spotted owls, and determine occupancy and reproductive success to the extent feasible. Previously, there had been a few informal surveys in the area, but only one pair was reported in the Northwest Forest Plan.

Spotted owl inventory and monitoring by the NPS in Marin County includes public lands within GGNRA, Muir Woods, Point Reyes National Seashore, Mt. Tamalpais State Park, Samuel P. Taylor State Park, and Tomales Bay State Park, and is coordinated with the Marin County Open Space Reserves and Marin Municipal Water District.

These parks are situated within the immediate San Francisco Bay Area and receive several million visitors per year. Development pressures along the park borders result in habitat conversion and disturbance. The NPS Fire Management Program intends to increase the number and size of prescribed burns, and to remove vegetation to construct miles of fire breaks along Point Reyes, GGNRA and Muir Woods boundaries because of concern about wildfires along the urban/wildland interface. Because this population is geographically isolated, it may also be genetically isolated from other NSO populations. The barred owl, a known predator of NSOs, is currently reported 35 miles north of the GGNRA/Point Reyes National Seashore borders and likely will occur in the parks within the next few years.

The parks completed NSO inventory of parklands in 1998 and initiated a demographic study and color-banding of spotted owls. Study objectives include:

1. Quantify population demographics on a nest-site basis over 5 years (nest site occupancy, turnover rate, survival/dispersal, reproductive rates),

2. Reduce habituation of NSOs through modified survey protocols,

3. Quantify the known and predicted distribution and density of owls through GIS spatial analysis and habitat modeling,

4. Characterize habitats around owl nest sites through GIS spatial analysis, relate population demographics to habitat characteristics, and

5. Design robust, habitat-based protocols to monitor the long-term health of NSOs within GGNRA, Muir Woods, and Point Reyes National Seashore boundaries.

GGNRA wildlife staff will continue to coordinate the spotted owl demographic monitoring project as a cooperative effort (supplemented by volunteer support) on lands within GGNRA, Point Reyes National Seashore, Muir Woods National Monument, and California state parks (in five state parks). NPS will coordinate survey efforts with Marin County Open Space District, and the Marin Municipal Water District. Grant funding through the National Park Foundation Canon Expedition into the Parks, and the Marin Audubon Society was obtained to partially support this project (NPS GS-7 bio-tech and Point Reyes Bird Observatory contract) through 2000. After that time a 0.5 full-time position (FTE) GS-7 bio-technician and an intern, as well as shared support for Point Reyes Bird Observatory with Point Reyes National Seashore will be needed to support long-term demographic monitoring.

Project statements directly related to northern spotted owl inventory, monitoring and protection include:

GOGA-N-032	Old Growth Forest Species Protection
GOGA-N-032.002	Spotted Owl Monitoring
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-074	Avian Resource Inventory
GOGA-N-007	Vegetation Inventory Monitoring
GOGA-N-014	Geographic Information System Development
GOGA-N-0003	Prescribed Fire Program
GOGA-N-003.001	Impacts of Prescribed Fire on Terrestrial Vertebrates and Native Vegetation

4.4.3 Mission Blue Butterfly Monitoring and Protection

Prior to European settlement of the San Francisco Bay Area, the mission blue butterfly (*Plebejus icarioides missionensis*) was thought to have occurred throughout the coastal scrub habitat of the San Francisco peninsula. Its distribution is now restricted to three known areas: San Bruno Mountain (San Mateo County), the Skyline ridges, including Milagra and Sweeney ridges within GGNRA (San Mateo County), and the Marin Headlands (Marin County). Although not well documented, this dramatic decline is almost certainly due to two factors: habitat fragmentation and loss resulting from urban development, and habitat degradation due to increasing dominance of non-native plant species.

In 1976, the mission blue subspecies was listed as endangered by the USFWS and has since been listed as endangered by the CDFG. Although little is known about the ecology of this butterfly, preliminary studies have been conducted on populations on San Bruno Mountain. Based on this work, an influential Habitat Conservation Plan was developed that has served as a model for the management of endangered taxa.

In response to its endangered status, GGNRA initiated a broad-scale habitat restoration program removing French broom and pampas grass throughout its habitat in the park during the late 1980s and early 1990s. In 1994, the park initiated a long-term mission blue butterfly monitoring program at Milagra Ridge and Marin Headlands. A total of 30 permanent transects were installed in the park. Butterflies are surveyed using the low-impact Pollard technique where butterflies are counted, sex and behavior recorded within a timed, walking belt transect. Weather data is also collected at the start of each transect.

This systematic effort is providing valuable baseline data that will allow resource managers to assess the effectiveness of efforts to sustain viable populations of the mission blue butterfly. Long-term data also provides a foundation for more in-depth ecological studies of endangered species. The monitoring methods employed at GGNRA have recently been adopted at other mission blue sites in San Mateo County.

Five consecutive years of mission blue butterfly monitoring have been completed with annual reports compiled for each year for Marin Headlands and Milagra Ridge. Results indicate that precipitation regimes and ambient air temperature influence butterfly abundance and phenology. 1998 mission blue butterfly abundance was the lowest in 5 years, coincident with El Niño conditions with elevated winter and spring rainfall. The butterfly's host plant, the lupine, experienced significant die-back throughout the butterfly's range, probably due to a pathogen encouraged by the heavy rains. Long-term monitoring will allow resource managers to determine the long-term impact of the lupine die-back on butterfly abundance. GIS analysis allows park managers to assess host plant die-back, non-native plant invasion, and butterfly abundance.

The mission blue butterfly continues to be threatened by development adjacent to park boundaries, fragmentation of remaining habitat, visitor use impacts including social trails, past land use practices, erosion, invasion of non-native plant species, maintenance of park roads and trails, development of new trails, law enforcement activities, and changes in the natural fire regime within the park.

Project statements directly related to mission blue butterfly protection and monitoring include:

GOGA-N-004	Mission Blue Butterfly Habitat Restoration
GOGA-N-004	Mission Blue Butterfly Habitat Restoration – Marin Headlands
GOGA-N-004	Mission Blue Butterfly Habitat Restoration – Milagra Ridge
GOGA-N-004	Mission Blue Butterfly Habitat Restoration – Butterfly Monitoring
GOGA-N-001	Control Alien Plant Species
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-014	Geographic Information System Development

4.4.4 Bank Swallow Monitoring and Protection

The short- and long-term viability of the bank swallow (*Riparia riparia*, a state-listed threatened species) colony at Fort Funston is threatened by accelerated cliff erosion from visitors climbing and carving graffiti in the cliff face, visitors hiking in closed areas, shoreline stabilization projects, accidental hang-glider overflights, overflights of helicopters and small planes, possibly unnaturally elevated numbers of predators (American kestrels) and competitors (European starling) using manmade perches and nest-sites, sea-level rise, and natural coastal erosion.

Approximately 50 percent of bank swallow habitat in California has been lost, primarily due to river bank stabilization. The Fort Funston colony is one of only two colonies along the California coast. The park has made significant efforts to protect the colony from disturbance, but its location makes complete protection from visitor impacts impossible.

A long-term monitoring program conducted by park staff and volunteers was established in 1993 to look at year-to-year variation in bank swallow use of the colony, measure productivity of the colony, document predation and human disturbance levels, and determine long-term trends in occupancy and reproductive success. The precision of the population monitoring is limited by use of unobtrusive survey methods, dictated by the fragile and inaccessible nature of the cliffs. Photo-monitoring is conducted each year before and after breeding season and photos are archived to preserve a long-term record of colony use. The extent of the colony is also mapped in the park's GIS and changes are recorded each year.

"Baseline" physical parameters of the site (cliff height, slope, and length) need to be measured and cliff erosion rates throughout the colony need to be surveyed periodically to predict the physical longevity of the colony. Park natural resource staff will continue to conduct this monitoring project using volunteers. Additional wildlife staff support (0.2 FTE Biological Technician) is needed to assist in coordination, to provide quality assurance, and further refine methodologies.

Project statements directly related to bank swallow protection and monitoring include:

GOGA-N-021	Protect and Manage Bank Swallow Population
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-018	Monitor Beach Erosion

4.4.5 Alcatraz Island Wildlife Monitoring and Protection

Alcatraz Island supports the most diverse assemblage of marine and estuarine colonial nesting waterbirds in San Francisco Bay and some of the most significant wildlife resources within GGNRA. San Francisco Bay's only colonies of pelagic and Brandt's cormorants, and pigeon guillemots occur on the island. The western gull colony is one of the largest along the central coast of California, and the black-crowned night-heron colony is one of the largest in the greater San Francisco Bay region. Great egrets, snowy egrets and black oystercatchers have all recently begun nesting on the island.

Colonial nesters generally breed in isolated, inaccessible mainland locations, or on little-inhabited islands, where they can avoid disturbance that can result in colony abandonment or total reproductive failure. Alcatraz Island is the only San Francisco Bay island supporting colonial waterbirds that is open to the public and receives 1.4 million visitors per year. At least two "undisturbed" San Francisco Bay island colonies have been recently abandoned by night-herons and egrets.

Colonial nesting waterbirds also serve as important biological monitors of the health of estuarine ecosystems. They are high in the food web and may reflect contamination in a variety of ecosystem components. Previous studies of San Francisco Bay wildlife, including black-crowned night herons in San Francisco Bay and on Alcatraz, have found elevated levels of organochlorine pesticides and heavy metals at levels associated with reproductive impairment.

Several other bird species also nest on Alcatraz, including Anna's hummingbird, Canada goose, common merganser, common raven, fox sparrow, house finch, mallard, song sparrow and white-crowned sparrow. One amphibian, the California slender salamander, and one native mammal, the deer mouse, inhabit the island. A color variant of the deer mouse occurs on part of the island and may be unique to Alcatraz. The introduced Norway rat was discovered on the island in 1998.

Wildlife resources on Alcatraz Island are imminently threatened by an array of existing, impending, potential, and cumulative internal and external threats and pressures.

With the advent of increased NPS funding for Alcatraz projects (fee demonstration program, Government Improvement Act, line-item construction), increased visitation, and increased revenues generated by the Golden Gate National Parks Association, structural stabilization and rehabilitation projects, once thought impossible, will be completed. An environmental impact statement, addressing the impact of stabilization/rehabilitation projects on Alcatraz wildlife, is in preparation.

The Alcatraz wildlife monitoring and protection program is developing and implementing projects to further preserve and protect Alcatraz' and San Francisco Bay's colonial waterbird diversity, and to educate the public about the significance of Alcatraz colonial waterbirds to biodiversity in the San Francisco Bay region. Alcatraz colonial nesters also serve as biological indicators for assessment of the long-term ecological health of San Francisco Bay.

Program components already initiated or implemented include:

- Environmental Impact Statement preparation on impacts of construction projects on colonial nesting birds and mitigations to avoid impacts and restore populations

- Long-term monitoring of Alcatraz colonial nesting birds (annual breeding populations and reproductive success)

- Development and implementation of disturbance monitoring protocols for black-crowned night-herons, western gulls and seabirds, to document and address internal and external sources of disturbance
- Western gull management to protect integrity of historic structures and human health and safety in visitor use areas
- Common raven monitoring and management to protect colonial nesting birds from unnaturally elevated levels of predation
- Norway rat eradication
- Natural resource education and interpretation

Additional program components requiring funding for development and implementation include:

- Establish an estuarine reserve or protection zone along the north, west and southwest sides of the island
- Assess environmental contaminant levels in colonial nesters as indicators of health of San Francisco Bay
- Document foraging resources utilized by Alcatraz seabirds
- Assess deer mouse genetics and restoration following Norway rat eradication
- Develop natural resource exhibits, and interpretive materials
- Determine deer mouse and slender salamander protection and monitoring needs

Project statements directly related to Alcatraz Island wildlife protection and monitoring include:

GOGA-N-013	Develop a Comprehensive Plan for Alcatraz Island
GOGA-N-013.001	Colonial Waterbird Monitoring on Alcatraz Island
GOGA-N-013.002	Western Gull Management on Alcatraz Island
GOGA-N-013.003	Norway Rat Eradication on Alcatraz Island
GOGA-N-181	Integrated Pest Management
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-018	Monitor Coastal Erosion
GOGA-N-046	Research Marine and Estuarine Resources

4.4.6 Management of Mountain Lion/Coyote–Human Interactions

Mountain lions (*Felis concolor*) and coyotes (*Canis latrans*) both occur regularly in Marin and San Mateo counties within GGNRA. The coyote has recolonized open space and parklands after being absent for 30 years due to eradication efforts by ranchers. Protection of these species along the urban/wildlife interface requires education and management of park visitors to ensure that their interactions with mountain lions and coyotes do not jeopardize human health and safety or the well-being of these animals.

The following program is designed to achieve these goals, if funding is available. Some components of the program have been initiated, but most have not been developed or implemented due to lack of resources.

Program components include:

- Develop and implement mountain lion/coyote – human interaction management plan/standard operating procedure
- Develop an agreement with CDFG and surrounding land managers for coordinated incident response
- Formalization of the mountain lion/coyote – human interaction observation and reporting system, including training of park staff
- Update and refine interagency observation database, maintain database and GIS layer in cooperation with USGS Biological Resources Division Golden Gate Field Station
- Natural resource education and interpretation – complete mountain lion site bulletin (adapt coyote site bulletin developed by San Mateo County parks)
- Develop permanent trailhead signs on wildlife encounters and personal safety
- Train park Wildlife Biologist (and other pertinent park staff) in wildlife immobilization techniques

Project statements related to management of mountain lion/coyote-human interactions:

GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-014	Geographic Information System Development
GOGA-N-035	Urban Carnivore Study
GOGA-N-047	Monitor Rare Wildlife Species
GOGA-N-075	Terrestrial Vertebrate Inventory and Monitoring Program
GOGA-N-181	Integrated Pest Management Program

4.4.7 Rat Eradication on Alcatraz Island

Norway rats were discovered on Alcatraz Island in 1998, the first incidence known in 25 years of NPS management of the island. Rats constitute a health hazard to humans. They destroy historic structures and artifacts, as well as electrical wiring, by chewing through materials. Rats are also known to decimate native bird and rodent populations on islands. Norway rats, which dig burrows and are larger than black rats, are believed to pose a greater threat to seabirds by consuming adults, chicks and eggs, and have been implicated in the disappearance of deermouse populations on other islands. Visitor experience on Alcatraz would also be negatively affected if the rat population increases beyond its current level.

Alcatraz Island supports one of the largest and most diverse assemblages of colonial nesting birds in San Francisco Bay. Pigeon guillemots, burrow nesting seabirds whose only breeding site within the bay is on Alcatraz, would be particularly vulnerable to rat predation as adults leave their chicks unattended in their burrows while feeding. Cormorants and western gulls are probably too large to suffer significant predation. Black-crowned night-herons, which will feed on rats, also leave their chicks unattended for extended periods of time, and may be vulnerable. Hatching and fledging rates for night-herons, which

exhibit significant annual variation, have declined over the last two years, which may or may not be associated with the presence of Norway rats.

Alcatraz Island also supports native deer mice and California slender salamanders. The deer mice exhibit a well-described color morph on part of the island. It is possible that deer mice on islands within San Francisco Bay have evolved in isolation into unique genetic variants. Norway rats could cause the extirpation of deer mice on Alcatraz. The effect of Norway rats on salamander populations is unknown.

Numerous large and long-term construction projects are currently planned for seismic stabilization and rehabilitation of historic buildings on Alcatraz Island. The quantity of materials barged to and stored on the island will increase dramatically with these projects, increasing the likelihood of further rat infestations, if active management to prevent introductions is not pursued.

Implementation of a rat eradication program is critical for protection of human health, as well as protection of nationally significant cultural and natural resources.

This project will develop and implement both a plan to eradicate Norway rats from Alcatraz Island and a management plan to prevent further introductions of rats to the island. An integrated pest management approach to rat eradication will be followed, that protects island natural and historic resources, as well as human health. While most rat eradication projects have been conducted on remote, little-inhabited islands, with broadcast applications of poison baits, the presence of 1.4 million visitors a year on Alcatraz may significantly affect the choice of alternatives.

Tasks to be conducted include:

1. Conduct an island-wide assessment of the extent of the rat infestation. (Rat activity was observed in late 1998 in seabird nesting areas.) The expected impact to island resources and change in the rat population would be projected following this assessment.

2. Interim trapping using snap traps or bait blocks in enclosed traps would be continued in the most critical areas of the island.

3. Evaluate deermouse (*Peromyscus*) population genetics from Alcatraz, Angel Island (where soil is known to have been imported from) and other nearby islands supporting deermice, and from nearby mainland locations. Determine whether deermice can be reintroduced from another source if extirpated, or if a captive rearing program would be necessary for re-introductions.

4. Develop rat eradication and deermouse reintroduction plans and prepare an environmental assessment if necessary.

5. Implement rat eradication and deermouse protection or reintroduction plans.

6. Develop and implement a plan to prevent further introductions and isolation, containment and rapid eradication of re-infestations.

Project statements related to rat eradication on Alcatraz Island include:

GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-013	Develop a Comprehensive Plan for Alcatraz Island
GOGA-N-013.001	Alcatraz Island Colonial Waterbird Monitoring and Protection

GOGA-N-013.003 Norway Rat Eradication on Alcatraz Island
GOGA-N-181 Integrated Pest Management Program

4.4.8 Old Growth Forest Wildlife Species Inventory and Protection

Muir Woods National Monument contains the last remaining contiguous stand of old growth redwood forest in Marin County. Stands of old growth Douglas fir also occur upslope of the main redwood grove. This 500-acre remnant old growth forest supports the southernmost pair of breeding northern spotted owls. Old growth redwood and Douglas fir forests to the north and south also support other threatened, endangered and sensitive species that are either dependent on, or prefer old growth forest habitat. GGNRA and Muir Woods identified the need to conduct further inventory for sensitive species within Muir Woods in order to provide direction for management to better protect these remnant significant resources.

GGNRA and Muir Woods are also implementing long-term planning efforts for Muir Woods and the entire watershed. Potential future actions include re-location of the concession, visitor facilities, and parking that currently occupy a portion of Muir Woods. Other major restoration projects within and downstream of Muir Woods are in various phases of implementation or planning (coho salmon/steelhead restoration, Big Lagoon restoration, Banducci flower farm restoration, and consideration of alternatives to Redwood Creek as a water source for the Muir Beach community). This program provides a more complete characterization of the wildlife sensitivities and protection needs within Muir Woods and the watershed.

The five major components of this project were initiated in 1997 and will be completed by 2000. These include:

1. Marbled murrelet and landbird inventory
2. Bat inventory
3. Mammalian diversity inventory
4. California giant salamander inventory
5. Point Reyes mountain beaver inventory

The objectives of each component include development and implementation of baseline inventories for each of the target species groups in an effort to determine presence/absence, relative abundance, and geographical distribution of sensitive species within Muir Woods National Monument and the immediately surrounding lands. A more comprehensive understanding of wildlife species and wildlife habitat diversity will result from this project as well as protocols for long-term monitoring of old growth forest wildlife resources. Results of the project are being mapped in ArcView 3.1.

This project has been funded by NPS region funds for small park NRPP. The GGNRA Natural Resource Management Specialist (wildlife) serves as project manager for this project. Field inventories have been conducted through interagency and cooperative agreements with the USGS Biological Resources Division, and Point Reyes Bird Observatory. Additional funding will be required in the future to implement periodic long-term monitoring of old growth forest wildlife resources.

Although habitat throughout the monument is suitable for nesting of the federally threatened marbled murrelet, no positive detections have been made during murrelet inventory work. Nearshore surveys and searches for eggshell fragments beneath suitable nests trees are being conducted in 1999. Ravens and jays are known to be major predators on marbled murrelets. All corvid observations are being documented as part of this project. Thirty-five species of landbirds were detected during point count

surveys in 1998. The most abundant species were the Pacific-slope flycatcher, winter wren, golden-crowned kinglet and chestnut-backed chickadee. Six landbird species are on the Audubon WatchList for California, with two of those, the band-tailed pigeon and Allen's hummingbird, on the National WatchList.

To date, mammal surveys have confirmed the presence in Muir Woods of a federal species of concern, Townsend's western big-eared bat, that had recently been found roosting in hollow redwood and bay trees in the county. Several other species of bats were also detected in Muir Woods in May 1999, including two additional federal species of concern, the Yuma and fringed myotis bat. California myotis, silver-haired and western red bats were also captured in mist-nets and released. Bat are being surveyed using mist-nets, acoustic monitoring and guano traps in hollow redwood trees. No evidence of mountain beaver activity was found during targeted surveys in 1998.

Project statements directly related to old growth forest species inventory and protection include:

GOGA-N-032	Old Growth Forest Species Protection
GOGA-N-032.002	Spotted Owl Monitoring
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-074	Avian Resource Inventory
GOGA-N-075	Terrestrial Vertebrate Inventory and Monitoring
GOGA-N-007	Vegetation Inventory Monitoring
GOGA-N-014	Geographic Information System Development
GOGA-N-0003	Prescribed Fire Program
GOGA-N-003.001	Impacts of Prescribed Fire on Terrestrial Vertebrates and Native Vegetation

4.4.9 Avian Inventory

GGNRA and Point Reyes National Seashore share boundaries and ecologically share many species, habitats and resource issues. The two parks include more than 160,000 acres of land, 150 miles of shoreline, and around 65 vegetation classes (as identified by the California Native Plant Society classification system). In addition, the boundary of the Point Reyes National Seashore extends ¼ mile offshore in some of the most productive marine habitat in the world, where coastal upwelling provides nutrient rich waters for marine life. The two parks also include the surface waters of Tomales Bay (a 12-mile-long estuary), Drakes Estero (a 2-mile-long estuary), and portions of Bolinas Lagoon (a wetland of international significance).

Consequently, the diversity and abundance of avifauna of these parks is extraordinary, including large and rare populations of landbirds, seabirds, shorebirds and waterbirds. Located along the Pacific flyway, the region has very high numbers of resident and migratory birds. Over 438 species have been documented at Point Reyes National Seashore; 246 are categorized as rare by the "Field Checklist of Birds for Point Reyes National Seashore." Twelve species of seabirds that nest in the region represent around half a million birds, which makes this area one of the most significant seabird breeding areas south of Alaska.

Substantial amounts of data have been collected on birds in this region for more than a century, including 36 continuous years of landbird data collected by the Point Reyes Bird Observatory. Nevertheless, systematic and coordinated surveys have not been conducted between the parks until the last few years, and many areas within the parks have not been inventoried. During an inventory and monitoring scoping session in 1996, the parks identified avifauna as a major component of ecosystems to be inventoried and monitored.

The overall goal of this project is to document avian species distribution, relative abundance, and species richness and diversity in all of the major habitats in three national parks of the San Francisco Bay Area. GGNRA will provide a sound scientific-based inventory of all major groups of birds that breed and winter in parks. Information gathered will help identify important areas, habitat features, and landscapes that support viable and diverse bird populations. Results from the inventory will provide a basis for development of a long-term monitoring program. This project will not inventory seabirds in the three coastal parks; this is a task that is partially being completed under other studies but additional work will be required to complete a comprehensive inventory.

Project objectives include:

1. Document distribution, relative abundance and species richness of avifauna in the major habitat types (around 50).

2. Document 90 percent of breeding landbird species and describe their habitat associations.

3. Document 90 percent of winter shorebirds and describe their habitat associations.

4. Document 90 percent of winter waterbirds and describe their habitat associations.

5. Develop distribution maps for 80 percent of the species breeding in the parks and for the abundant wintering species.

6. Provide summary information for developing a conceptual long-term monitoring plan for breeding landbirds and wintering shorebirds and waterbirds.

Inventory plots will be coordinated with other inventory efforts in the parks, include small mammal and vegetation inventories.

Related project statements include:

GOGA-N-074	Avian Resource Inventory
GOGA-N-074.001	Riparian Bird Monitoring
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-075	Terrestrial Vertebrate Inventory and Monitoring
GOGA-N-007	Vegetation Inventory Monitoring
GOGA-N-014	Geographic Information System Development
GOGA-N-0003	Prescribed Fire Program
GOGA-N-003.001	Impacts of Prescribed Fire on Terrestrial Vertebrates and Native Vegetation

4.4.10 Riparian Landbird Monitoring and Protection

Declines in North American songbird populations, particularly those that breed in North America and migrate to the neotropics, have received considerable attention in recent years (Hagan and Johnston 1992). Variation in reproductive success has been suggested as a major cause of population declines of neotropical migrants. Understanding the impact of non-native plant species on breeding songbirds as well as collecting baseline information to evaluate restoration efforts will help reverse these declines. National parks have been considered the most important areas in which to conserve and monitor biotic communities as ecological reference sites (Dasmann 1972).

This project will supplement an existing songbird monitoring project initiated by the Point Reyes Bird Observatory with the GGNRA in 1997 (Gardali and Geupel 1997). Initial results of songbird monitoring within the Redwood Creek watershed indicate that nest success of the four most common neotropical migrant and resident songbirds (Swainson's thrush (*Catharus ustulatus*), warbling vireo (*Vireo gilvus*), Wilson's warbler (*Wilsonia pusilla*), and song sparrow (*Melospiza melodia*) is exceptionally poor as compared to similar watersheds in coastal Marin County.

This purpose of this project is to conduct monitoring and habitat assessment to determine the impacts of non-native Cape ivy (*Dolairea odorata*), formerly referred to as German ivy (*Senecio mikanioides*), and its removal, on riparian songbirds. Baseline data will be collected to allow the success of riparian habitat restoration to be evaluated in relation to songbird diversity, abundance and nesting success. Habitat and floristic data will be analyzed to develop specific restoration recommendations to improve riparian breeding habitat. Removal and containment of Cape ivy has been identified as the highest natural resource management priority within the GGNRA because it has been shown to cause a reduction in the abundance of several orders of insects and a decrease in plant species richness. Cape ivy is spreading most rapidly within riparian corridors that provide habitat critical to several endangered aquatic species (NPS, GOGA-N-074). Rapidly expanding infestations of Cape ivy may also negatively affect the breeding productivity of landbirds.

Impacts to songbirds, habitat assessment, and development of riparian restoration recommendations will be accomplished by comparing bird response and associated habitat characteristics on three permanent plots (an existing Cape ivy containment plot, a plot heavily infested with Cape ivy identified for complete eradication beginning in 1998, and a reference plot relatively undisturbed by Cape ivy) along Redwood Creek and to similar watersheds in coastal Marin County. Continued monitoring in future years would provide valuable insight into long-term breeding bird response to riparian restoration efforts.

Bird monitoring and habitat assessment will address four objectives that will facilitate GGNRA riparian restoration and management:

1. Provide baseline data on species richness, diversity, abundance, and nesting success by which changes made to the watershed (Cape ivy removal and habitat restoration) can be measured over time.

2. Evaluate how vegetation structure and composition influence nest site selection and nest success.

3. Provide specific recommendations for restoration to improve riparian breeding habitat within the Redwood Creek Watershed.

4. Evaluate the success of Cape ivy removal and habitat restoration efforts relative to breeding bird species richness, diversity, abundance, and nesting success.

Special attention will be given to four species during nest monitoring: Swainson's thrush, warbling vireo, Wilson's warbler, and song sparrow. Three of the species are understory nesters, and one (warbling vireo), is a canopy nester. These species are all statewide riparian priority species as defined by California Partners in Flight; the song sparrow, Swainson's thrush, and Wilson's warbler are the most abundant species breeding on our Redwood Creek nest plots, and by including the canopy-nesting warbling vireo, the response of understory-nesting species can be compared/contrasted with that of a canopy nester. These four species are among the most abundant species in riparian areas of coastal Marin County and have a high percent mean similarity in proportional abundance between all Point

Reyes Bird Observatory study sites in GGNRA and Point Reyes National Seashore, enabling an increase in sample size and statistical power for data analysis.

Habitat assessment is conducted at all nest site locations, 24 random locations, and all point count stations during the breeding season to establish relationships between population parameters and vegetation variables. Methods follow the Breeding Biology Research and Monitoring Database protocol for nest sites (Martin and Conway 1994). Vegetation at each point count station will be assessed using a relevé, a plot of 50-meter radius centered on the census point.

Recommendations for riparian restoration were generated by correlating habitat assessment variables with nest monitoring and point counting information at Redwood watershed and other similar watersheds in coastal Marin County, and will be further refined as additional data are available.

Project statements related to riparian landbird monitoring and protection include:

GOGA-N-074.001	Riparian Bird Monitoring
GOGA-N-074	Avian Resource Inventory
GOGA-N-001.006	Control of Alien Plant Species – Cape Ivy
GOGA-N-006	Resolve Human/Natural Resources Conflicts
GOGA-N-007	Vegetation Inventory Monitoring
GOGA-N-014	Geographic Information System Development
GOGA-N-038	Develop Riparian Zone Management Guidelines

4.5 Integrated Pest Management (IPM)

A comprehensive integrated pest management (IPM) Program has yet to be developed at the park, although a plan for the Presidio was completed in 1996 and 1 FTE, a WG-10 Pest Controller reporting to the Division of Natural Resources Management and Research, has been dedicated to integrated pest management on the Presidio since 1997.

Park-wide IPM program needs include management of pest problems affecting structures, developed lands, natural areas, cultural resources, historic forests, wildlife populations, and human health and safety. A wide variety of non-native animals, vertebrate and invertebrate pests, non-native plants, and disease organisms affect rare and endangered plants and animals that inhabit the park, structural integrity of historic and non-historic buildings, and trees, creating potentially hazardous conditions to life and property.

Feral, non-native, and unnaturally elevated populations of native animals affect human health and safety as well as natural and cultural resources throughout the park. Non-native problem animal species include Norway and black rats, feral cats, feral hogs, wild turkeys, starlings, and typical developed area pests. Unnaturally elevated native animal populations include skunks and raccoons in developed areas, western gulls in visitor use areas of Alcatraz Island, common ravens and other corvids, and woodrats invading buildings in Muir Woods.

The scope of integrated pest management needs in the park is extremely broad and includes concession-operated food services, a golf course, horse stables, a multitude of park partners and their associated facilities and programs. Examples include marine mammal care facilities, laboratories, gardens and museums.

The park is committed to innovative technologies and sustainable design practices to support a strong integrated pest management philosophy. The park follows the guidance in NPS-77 in addressing IPM program needs, and will strive to adhere to new guidelines as they are developed.

4.6 Vegetation Program

The park's Vegetation Management Program is a multifaceted, community-based stewardship program that emphasizes the inventory, monitoring, protection, restoration and rehabilitation of the park's diverse vegetation resources at the population, watershed and/or ecosystem level. These efforts are often undertaken through establishing partnerships with adjacent land management agencies, local universities, colleges, and school districts, non-profit community organizations, park partners, local and national conservation and community corps, and state and national environmental organizations. Aspects of the vegetation management program include vegetation data management; invasive non-native plant control and management; vegetation and restoration-based resource education program delivery and coordination; rare plant monitoring; research; community-based stewardship program coordination; and native plant propagation and nursery management.

The Vegetation Management (Stewardship) Program has two primary goals:

- To implement a scientifically based ecological restoration program in disturbed park lands, protecting, enhancing and restoring the park's native vegetation communities, with emphasis on populations of rare or endangered species, rare plant communities and special ecological areas, as well as controlling the highest priority invasive non-native plant threats impacting the park's ecosystems.

- To create and foster a volunteer program that serves community needs for ecological recreation and builds a constituency around an ethic of ecological restoration and stewardship through teaching people, especially youth, concepts of community, ecology, and restoration practices using the park's ecosystems as hands-on experiential classrooms.

The following is an overview of GGNRA's Vegetation Management Program (Vegetation Stewardship Program) and strategy for achieving the program's goals.

4.6.1 Habitat Restoration Through Community Stewardship Programs

A variety of past and current land uses (e.g., quarry construction, trail and road corridor development, parking lot and infrastructure construction, ornamental vegetation plantings, leach field installation, grazing, filling of wetlands, suppression of fires, and diverse recreational use) have converted approximately 10 percent of the park's once ecologically rich native plant communities to the status of "disturbed" lands. The need to prevent further impacts, and to incrementally convert disturbed lands to functioning native communities, has resulted in the development of GGNRA's large-scale community-based habitat restoration efforts.

The habitat restoration component of the Vegetation Stewardship Program currently consists of four key program elements: the Site Stewardship Program, the Presidio Park Stewards, the Habitat Restoration Team, and the Invasive Plant Patrol – each having vegetation management responsibilities that are defined primarily by geographic ranges (subwatersheds and watersheds). Integrally linked to the field habitat restoration program is the park's Native Plant Nursery Program. The relationship and roles between these program elements varies from watershed to watershed and in scope of work. In some areas, Fort Funston for example, the nursery program and field restoration program elements are tightly

woven, and are implemented by the same volunteer stewards. On the Presidio, the nursery and field program components have grown so significantly that their linkage is based upon strong relationships and shared responsibilities between individual program element managers — with volunteer stewards often having distinctly different responsibilities.

A detailed description of the planning and prioritization strategy for implementing habitat restoration projects at the park is found in Appendix A. This strategy includes program elements that plan, coordinate and implement the strategy through the park.

The Vegetation Stewardship Program coordinates habitat restoration activities in more than 2,500 acres of the park. Activities are located throughout the park, from Bolinas Ridge in the north, to Sweeney Ridge in the south, a distance of approximately 30 miles. The program conducts restoration projects in many habitat types including sand dunes, coastal bluffs, grasslands, coastal scrub, streams, coastal wetlands, oak woodlands, and redwood forest.

Habitat Restoration Team

The Habitat Restoration Team (HRT) is a drop-in community-based program that works throughout the park implementing restoration activities. It is facilitated by Natural Resource Management (NRM) and supported in part by the Golden Gate National Parks Association. The program coordinator prepares comprehensive management plans for each restoration region and/or project, and an annual plan that outlines the program's objectives and targeted activity locations within the 22 watersheds covered by HRT. Within each subwatershed and restoration site, the volunteers accomplish a variety of management activities such as removing invasive non-native plants, gathering propagules, revegetation, and monitoring. HRT works in 5 of the park's special ecological areas. HRT appeals to all age groups and backgrounds, and attracts approximately 20 to 30 people each workday (workdays are conducted once a week). Many HRT volunteers have participated in the program for more than 9 years, and contribute to the larger vegetation program's goals through their invaluable knowledge about the park's resources.

Site Stewardship Program

This program is facilitated and supported by the Golden Gate National Parks Association and overseen by NRM. Volunteers in the Site Stewardship Program (SSP) take responsibility for planning and implementing restoration and other natural resource management activities in their adopted watersheds. There are currently three regions that have been adopted by Site Stewards: Oakwood Valley, Milagra Ridge and Wolfback Ridges. Site Stewards create comprehensive management plans for outlining proposed restoration activities, recruit and manage other volunteers to help, schedule activities, and supervise, document and monitor the work that is done in the park's Restoration Database. Site Stewardship Program volunteer recruitment targets local constituents who desire greater involvement with their environment and surrounding community, and are able to commit time and energy toward developing a program of their own. Additionally, the SSP has developed five long-term partnerships with local schools, universities and non-profit organizations to provide consistent community participation for priority restoration projects.

The Presidio Park Stewards

This program focuses its habitat restoration and resource education programs in GGNRA's urban center — the Presidio of San Francisco. The program's primary responsibility is for the stewardship of approximately 140 acres of rare or endangered plant habitat (supporting 12 special status species), which

is expected to expand to approximately 430 acres (over approximately 50 years), upon the implementation of the Presidio's Vegetation Management Plan. Three of the park's special ecological areas are found within the 140 acres currently stewarded by the program. Volunteer recruitment for the program focuses primarily on the diverse constituents of San Francisco, local urban youth, and members of local environmentally based non-profit groups. The Presidio Park Stewards have also developed long-term partnerships with six local high schools, several universities, Americorps, and non-profit organizations to provide consistent community participation for priority restoration projects. Volunteers remove non-native plants, propagate native species, administer resource education programs, develop interpretive materials, monitor rare species, conduct literature searches, participate in research studies and use GIS and the park's restoration database. The program is managed by NRM.

With the transition of 80 percent of Presidio lands now under the management of the Presidio Trust, the Presidio Park Stewards are working to develop a common vision and an integrated approach to vegetation management throughout the Presidio. Much of this approach will be defined throughout the implementation strategy developed through the Vegetation Management Plan for the Presidio.

Crissy Field Stewardship

The Crissy Field Stewardship Program is linked directly to the larger Presidio program. Due to the size of the Crissy Field Project's vegetation restoration efforts (18 acres of marsh re-creation and 11 acres of dune re-creation), a temporary off-shoot program was developed. The program is responsible for coordinating the community stewardship participation and resource education program for the first 10 years of the project (3 years of construction and 7 years of maintenance), at which time the maintenance of the restoration efforts will be incorporated into the larger Presidio Park Stewardship Program. This program is piloting the integration of a 20-person Americorps program into park operations to achieve the project's restoration objectives and community development objectives. The program is currently funded by the Golden Gate National Parks Association and overseen by NRM, and will be funded by NRM beginning in 2001.

Big Events

The size and scope of the community work days varies for each program. Most programs integrate approximately 40 people on a daily basis. Several times a year, however, GGNRA hosts big events (drawing hundreds of volunteers) such as the celebration of Earth Day, National Service Week, San Francisco Conservation Corps' Serv-athon, and other corporate-sponsored events. The worksites are chosen based on their ability to support large groups of people who accomplish a variety of tasks over a short span of time.

Other Groups

Many other groups plan and implement native plant restoration in the park. The park's Division of Maintenance has worked in cooperation with Natural Resource Management on several major trail obliteration and restoration projects. The California Department of Transportation and the Federal Highways Administration have implemented large-scale restoration projects that involve fill removal from wetlands and tunnel reconstruction, respectively. The Golden Gate Bridge District is currently restoring 18 acres of mission blue butterfly habitat at Fort Baker and Kirby Cove as a part of a mitigation requirement. In addition, private consultants and contractors, and local Conservation Corps are often hired to assist the park in accomplishing restoration objectives. Vegetation program staff serve as the

park's liaisons for the majority of these projects, and provide technical expertise and oversight to each agency's project when required.

Resource Education (Curriculum and Non-Curriculum-Based)

All Vegetation Stewardship Program elements participate in a diversity and continuum of resource education activities. These activities range from creating brochures and slide presentations regarding vegetation management activities (i.e., invasive non-native tree removal in urban areas) to developing and implementing curriculum-based, restoration-focused programs for middle and high school students (this is done in partnership with the Division of Interpretation). Participation in the development and delivery of resource education materials has been critical to the success of many issue-based resource management projects. In 1998 the Division of Interpretation piloted the Center for Resource Interpretation concept; however, lack of funding prevented its continuation. This model meets the resource education needs of the Vegetation Stewardship Program, and without its continuation and expansion, staff will have to continue to develop materials with limited resources, and with little formal training and experience in public program delivery, graphic layout and design, or brochure development.

Funding has been secured to support the curriculum-based resource education programs. The following programs are being formally piloted under the funding received.

National Park Labs: Students, Stewards and Sustainability. In 1995 the Presidio Park Stewards developed the Presidio Stewardship Education Program, a curriculum-based program that enabled high school youth to participate in the ecological restoration cycle of activities through adopting a site on the Presidio. In 1997 the Site Stewardship Program piloted a stewardship-based curriculum on Milagra Ridge. In the spring of 1998, GGNRA received a 3-year grant from Toyota USA Foundation/National Park Foundation to enhance and closely link the Presidio Stewardship Education Program and the Milagra Ridge Stewardship Program with new curricula, a telecommunications network for high school stewards (Web page), teacher institutes, increased opportunities for service learning, paid high school internships and translations of the curriculum into Spanish and Chinese. The Milagra component, in partnership with Oceana High School, includes a native plant nursery, which will be managed by Oceana High School students.

Here's the Dirt: Science Education at the Native Plant Nursery. In January 1999, GGNRA received a 2-year grant from Exxon Foundation/National Park Foundation to introduce national science standards to middle school programs at the Presidio and Marin Headlands Native Plant Nurseries. The program will be developed in partnership with teachers. Following a pilot phase, the program will be adopted by the native plant nurseries at Fort Funston and Muir Woods.

Key habitat restoration and community stewardship projects currently underway include:

- Crissy Field Marsh and Dune System Revegetation
- Mission Blue Butterfly Habitat Restoration
- Lobos Creek Dunes Restoration
- Rare Plant Habitat Restoration

Project statements directly related to habitat restoration include:

GOGA-N-004.000 Mission Blue Butterfly Habitat Restoration — Thoroughwort Control
GOGA-N-004.001 Mission Blue Butterfly Habitat Restoration — Marin Headlands

GOGA-N-004.002 Mission Blue Butterfly Habitat Restoration — Milagra Ridge
GOGA-N-004.003 Mission Blue Butterfly Habitat Restoration — Milagra Ridge (18 acres)
GOGA-N-015.000 Restore and Manage GGNRA Grassland Habitats
GOGA-N-021.000 Protect and Manage Bank Swallow Populations
GOGA-N-033.000 Crissy Field — Community Stewardship
GOGA-N-040.000 Protection of Unique Serpentine Bluff Features
GOGA-N-042.000 Lobos Creek Restoration, Protection and Management
GOGA-N-087.001 Habitat Restoration of Tennessee Valley ponds
GOGA-N-087.002 Restoring Ecosystem Function to Valley Soils
GOGA-N-091.000 Mountain Lake Management
GOGA-N-098.000 Oakwood Valley Stream Corridor Alternative
GOGA-N-180.000 Rodeo Lagoon Watershed Restoration

The Nursery Program

The park's native plant nursery program supports revegetation and community stewardship of the park's natural habitats. GGNRA's first native plant nursery was established 12 years ago at Fort Funston to fill a critical need for genetically appropriate native plant stock for use in the park's natural areas. Nurseries were then developed at Muir Woods, Tennessee Valley, Stinson Beach, the Presidio, Oceana High School and, most recently, at Fort Cronkhite. Because the nursery operations are dependent on local community support and involvement, distribution of the nurseries throughout the park allows volunteers to work in their own "backyards" on the entire range of restoration activities, both in the field and in the nursery. As a complement to growing and restoration activities, the nurseries offer educational programs that promote environmental awareness, understanding and stewardship in the youngest members of the community.

Presidio and Headlands Nursery are considered as the "major" nurseries, serving as centers of plant production within their respective districts. They have full-time staff, larger facilities and longer hours. The staff and facilities can support more extensive educational programs, allowing larger and more frequent visits by school and community groups. Like all the nurseries, the major nurseries rely on volunteer workers from their local communities. However, because of the emphasis on plant production at the major nurseries, volunteers spend more of their time propagating and tending plants than in the field doing restoration work.

"Satellite" nurseries serve a key role as centers for park restoration activities. Muir Woods, Tennessee Valley, Fort Funston and Oceana Nurseries have each built a strong constituency of local volunteers; park neighbors who want to learn about park stewardship by participating in all aspects of restoration work. Volunteers remove non-natives, collect seed, propagate plants, tend them and finally plant them on the site being restored. While these smaller nurseries have very modest facilities and lack room or staff to produce large numbers of plants, they are invaluable to the nursery system's mission of teaching and building community stewardship.

In 1997 steps were taken to organize the nurseries, then operating independently, into a more formalized nursery system capable of producing large numbers of healthy native plants for the growing number of park restoration projects. A full-time nursery specialist was hired by the Golden Gate National Parks Association to coordinate, streamline and professionalize nursery operations. The current nursery program propagates more than 120 different plant species, including the brackish and freshwater wetland species required for the restoration of the Crissy Field tidal marsh and dune system. Each nursery offers

resource education programs and two offer active curriculum-based education programs for diverse urban youth.

The park's nurseries have a goal to supply all the native plants needed for the continued restoration of degraded habitat areas throughout the park, as well as any unique non-native plants needed for restoration of the park's cultural and historic landscapes by 2002. This is expected to require production of up to 140,000 healthy plants per year. The work of the nurseries will be accomplished through the participation of a committed and diverse volunteer workforce. Additionally, the nurseries will offer an active curriculum-based education program, helping to instill in the next generation a love of nature, an understanding of the importance of natural systems and the flora that comprise them, an understanding of genetic conservation, and a sense of stewardship for the park and its resources. The educational program will serve the Bay Area's culturally and ethnically diverse community, giving many more children the opportunity to know and contribute to the preservation and restoration of this unique and valuable resource.

Revegetation

Revegetation efforts are directly linked to both the nursery and habitat restoration components of the vegetation program. Current efforts are underway to evaluate a representative sample of the park's past restoration efforts. Revegetation efforts representing a wide range of GGNRA habitat types have been selected for analysis. Information gathered for each site includes site physical and biological site characteristics, restoration history, including all soil or weed control treatments, and planting lists. Each site was surveyed to count surviving plants and evaluate their condition. At the time of writing, most sites have been surveyed, and the data are being analyzed. The results from this study will be used to assess past success, and to guide future choices about site selection and plant propagation. Additionally, this monitoring format can be used to track the success of outplanting efforts in new sites or with plants that have been propagated with different timing or propagation techniques.

Key revegetation projects currently underway include:

- Crissy Field marsh and dune system revegetation

Project statements directly related to native plant nursery management include:

GOGA-N-016.000 Management of Native Plant Nurseries — Program
GOGA-N-016.001 Management of Native Plant Nurseries — Seed Collection Guidelines
GOGA-N-016.002 Management of Native Plant Nurseries — Restoration of Adjacent Habitats

4.6.2 Invasive Non-Native Plant Management

The spread of non-native plants represents the most significant threat to the biodiversity of the park. The flora of the GGNRA is very rich, containing more than 48 vegetation plant community types (Keeler-Wolf et al. 1998). One or more of the park's 21 most invasive non-native pest plant species invade approximately 85 percent of these plant communities. Research on these invasive plants within the park has shown that their presence can alter community composition and reduce the diversity of native plants (Alvarez and Cushman 1997), insects (Fisher 1997) and small mammals (Howell, pers. comm. 1997). Invasive non-native species are also found within all nine Special Ecological Areas designated as the most biologically intact and diverse areas within the GGNRA (NRMP 1994); habitat for the federally endangered mission blue and San Bruno elfin butterflies, Raven's manzanita, Presidio clarkia, San

Francisco lessingia, as well as 12 other special status plants (listed by the state and the California Native Plant Society).

The existing park flora includes 886 vascular plant species and subspecies. Approximately 40 percent of the flora consist of non-native plants. A relatively small number of these non-native species are considered major threats. Control, containment and removal of invasive non-native plants are major components of the vegetation program. These efforts have resulted in the increase of species richness in once-impacted habitat, the improvement of wildlife habitat value, the conservation of rare plant and animal species, and the improvement of water quality. To date, control strategies have proven feasible for 12 pest species (*Genista monspessulana, Cytisus striatus, Cytisus scoparius, Delairea odorata, Leucanthemom vulgare, Cortaderia jubata, Centaurea solstitialis, Vinca major, Ulex europaeus, Arctotheca calendula, Hedera helix, Zantedeschia aethiopica*). These invasive plant populations are considered under control due to a decade of volunteer, staff and grant expenditures. And despite the extensive urban perimeter around the park, only two new invasive species have established small populations within the park within the last decade.

The remaining priority invasive non-native plant species (10 of the 21) have been targeted for control based upon their significant rate of spread, parkwide occurrence, formation of dense low diversity stands and feasibility of ongoing reduction and control. These species include: Monterey pine (*Pinus radiata*), eucalyptus (*Eucalyptus globulus*), Monterey cypress (*Cupressus macrocarpa*), black acacia (*Acacia melanoxylon*), thoroughwort (*Ageratina adenophora*), cotoneaster (*Cotoneaster* sp.), helichrysum (*Helichrysum petiolare*), Himalayan blackberry (*Rubus discolor*), tall fescue (*Festuca arundinacea*) and harding grass (*Phalaris aquatica*).

The strategy for controlling invasive non-native plant species in the park has evolved throughout the past ten years. The step-by-step approach to managing invasive non-native species is found in Appendix B. The effectiveness of the park's ability to implement each component is being and/or will be evaluated during the next two years.

Project statements directly related to invasive non-native species data collection and management include:

GOGA-N-001.001 Control of Exotic Plant Species — Program
GOGA-N-001.002 Control of Exotic Plant Species — Thoroughwort Containment
GOGA-N-001.003 Control of Exotic Plant Species — Bellardia Containment
GOGA-N-001.004 Control of Exotic Plant Species — Pampas Grass Containment
GOGA-N-001.005 Control of Exotic Plant Species — Cotoneaster Containment
GOGA-N-001.006 Control of Exotic Plant Species — Cape Ivy Management
GOGA-N-001.007 Control of Exotic Plant Species — Eucalyptus Grove Perimeter Containment
GOGA-N-001.008 Control of Exotic Plant Species — Eucalyptus Pilot Removal Project
GOGA-N-001.009 Control of Exotic Plant Species — Eucalyptus Grove Removal
GOGA-N-001.010 Control of Exotic Plant Species — Mattress Vine Containment
GOGA-N-001.011 Control of Exotic Plant Species — Ox-Eye Daisy Containment
GOGA-N-001.012 Control of Exotic Plant Species — Monterey Pine/Cypress Perimeter Containment
GOGA-N-001.014 Control of Exotic Plant Species — Monterey Pine/Cypress Removal
GOGA-N-001.015 Control of Exotic Plant Species — French Broom
GOGA-N-001.016 Control of Exotic Plant Species — Backlogged Bolinas/Coyote Ridge
GOGA-N-001.017 Control of Exotic Plant Species — Cyclic Maintenance

GOGA-N-001.018 Control of Exotic Plant Species — Containment of Exotic Woody Shrubs and Trees
GOGA-N-001-019 Control of Exotic Plant Species — Mapping Target Exotic Species
GOGA-N-001.020 Control of Exotic Plant Species — Harding Grass/Tall Fescue Containment
GOGA-N-004.000 Mission Blue Butterfly Habitat Restoration — Thoroughwort Control
GOGA-N-087.002 Restoring Ecosystem Function to Valley Soils

4.6.3 Rare Plant Management

Within GGNRA, 38 rare or special status species are currently identified. Of those species, 9 are federally endangered, 1 is federally threatened, 13 are federal species of concern, and the remaining 15 species are included or proposed for inclusion by the California Native Plant Society. GGNRA has adopted the policy that all special status plant species be afforded the full protection of the Endangered Species Act. The Superintendent may judge on a case-by-case basis that the evidence against the listing of a particular plant species is sufficient to allow a specific action. One of these species, the Raven's manzanita (*Arctostaphylos hookeri* ssp. *ravenii*), has a limited population of only one "wild" plant, with numerous clones that have been outplanted under direction of its recovery plan. This species occurs nowhere else in the world. The largest or majority of several of these species populations are found within the park (e.g., Presidio clarkia, San Francisco lessingia, Crystal Springs lessingia, San Mateo thornmint, fountain thistle, San Mateo wooly sunflower, and white-rayed pentachaeta). Many of the park's listed species occur in small numbers in only a few populations. Because the park provides one of the last refuges for many of these plants, it is critical that the remaining populations be protected and encouraged to expand.

For the past five years the primary focus of the park's rare plant program has been on the 12 special status species found on the Presidio. Staff and volunteers, working in partnership with local universities and community organizations, have monitored the range and size of each species populations, developed restoration and monitoring objectives for 70 percent of the species, controlled or removed the most significant invasive species threats for all 12 species, tripled the available habitat for both the federally listed San Francisco lessingia and Presidio clarkia through restoration efforts, increased the population of lessingia 100-fold, and presented public education and high school curriculum programs to increase public awareness, increase stewardship, and develop advocacy for the parks rare plant program.

The step-by-step approach to rare plant management in the GGNRA is found in Appendix C.

The strategy for managing rare plants in the GGNRA has been outlined in the following project statements:

GOGA-N-007.004 Vegetation Inventory and Monitoring — Rare Plant Protocol Development
GOGA-N-009.000 Rare Plant Management — Program
GOGA-N-009.001 Rare Plant Management — Raven's Manzanita Recovery Plan
GOGA-N-009.002 Rare Plant Management — Franciscan Thistle Management
GOGA-N-009.003 Rare Plant Management — Presidio Clarkia Management
GOGA-N-009.004 Rare Plant Management — Reintroduction of Rare Dune Species
GOGA-N-009.005 Rare Plant Management — Grazing Effects on Nicasio Ridge
GOGA-N-009.006 Rare Plant Management — Reintroduction of San Francisco Owl's Clover
GOGA-N-009.007 Rare Plant Management — Parkwide Plan Development/Implementation

4.6.4 Vegetation Inventory and Monitoring

Inventory and monitoring activities are necessary to collect information about the structure, function, condition and trend of the plant populations and communities within the park. The objectives of GGNRA's current Vegetation Monitoring Program are implemented by the larger field habitat restoration and community programs staff. Approximately 70 percent of the monitoring efforts are directed toward tracking the effectiveness of restoration management activities. The remaining 30 percent have focussed on the parkwide vegetation communities classification project and rare plant census. Additional resources are required to implement a more holistic vegetation monitoring program, which will include elements listed under the GGNRA and Point Reyes Inventory and Monitoring Plan section.

A synthesis of the existing vegetation monitoring program components and protocols (all are limited in application due to limited resources) is found in Appendix D.

Currently the park is compiling a joint Inventory and Monitoring Plan with Point Reyes. The vegetation monitoring program elements identified under this plan significantly expand the park's existing vegetation monitoring efforts to include landscape, community and population monitoring for all of the park's terrestrial ecosystems. At the population level, the criteria for selection of plants is classified into non-native plants, rare and endemic plants, pollution sensitive plants, and animal plant relationships. Efforts are underway to define the monitoring objectives, protocols, sampling design and data analysis for each of these categories, as well as fund the plan's implementation.

Project statements directly related to vegetation inventory and monitoring include:

GOGA-N-007.000 Vegetation Inventory Monitoring — Program
GOGA-N-007.001 Vegetation Inventory Monitoring — Vegetation Inventory
GOGA-N-007.002 Vegetation Inventory Monitoring — Host Protocol
GOGA-N-007.003 Vegetation Inventory Monitoring — Arthropod Inventory
GOGA-N-007.004 Vegetation Inventory Monitoring — Rare Plant Protocol Development
GOGA-N-007.005 Vegetation Inventory Monitoring — Exotic Species Inventory/Monitoring
GOGA-N-007.006 Vegetation Inventory Monitoring — Floral Inventory
GOGA-N-033.001 Crissy Field — Restoration Monitoring

The implementation of the vegetation monitoring program incorporates many long-term stewards, volunteers, interns, graduate students and schoolchildren, where feasible. This support has been critical both due to lack of federal funds, and to ensure that general public has a stake in the ecological health of the park's natural resources. Data collection and analysis needs to be coordinated by staff to ensure consistency, continuity and quality.

4.6.5 Sustainable Vegetation Waste Practices

A sustainable vegetation disposal program for waste material and forest products generated during tree hazard mitigation and other forest management activities is needed to ensure that organic debris is not disposed of in an unsustainable manner, that administrative needs for forest products for construction, restoration, interpretation, or other needs are met, and that valuable forest products are not disposed of without recovering their fair market value. The Green Maintenance movement that is gaining momentum at the park may generate and would support sustainable practices for dealing with forest products and byproducts, including sawlogs, firewood, chips and seeds.

The program will be developed jointly with other interested divisions in the park.

4.6.6 Information Management

GGNRA stores all its habitat restoration data for more than 140 project sites/subwatershed regions; vegetation and rare plant monitoring data; floral inventory; and native plant nursery program data within a parkwide restoration database. This database contains more than 25 separate databases containing more than 5,000 records, and is organized by watershed. The database is networked throughout the park using the CITRIX software platform. GGNRA vegetation staff and volunteers are also creating GIS layers of rare plant populations, restoration site locations, invasive species populations, watershed and subwatershed boundaries, vegetation plant communities and sensitive habitat areas. Efforts are underway to link both systems to provide a more effective and time efficient means to conduct planning efforts, and evaluate threats and values to natural systems. The database is presently run using Microsoft Access 2.0, and a database program designed two years ago for Windows 3.0. The most recent version of this database software is Access 97, designed for Windows 95. The GIS program uses ArcView 3.1.

Project statements directly related to information management include:

GOGA-N-014.000 Geographic Information System
GOGA-N-014.001 Geographic Information System — Vegetation Information Management Program
GOGA-N-014.002 Geographic Information System — Linking ArcView to Restoration Database

4.7 FORESTRY PROGRAM

The Forestry Program has three emphases: the interactions between natural resources and human history (cultural landscape management), the natural forest management of the park and hazard tree management. The program encompasses the trees and open spaces that frame signature vistas, constitute the habitats of plant and animal communities, and set the scene for historic landmarks.

Some park forests were purposefully designed and created using nonindigenous species. Most have evolved as the result of biotic and abiotic factors that have been markedly changed by post-Columbian residents.

To accomplish this program, a professional forester is needed. The forester will be familiar with natural resources management in the NPS and be able to interact with park staff, cooperators, contractors, and the public. Contractors will be employed to inventory forest resources and develop forest management plans, remove designated trees, prepare sites for restoration, and plant appropriate vegetation. Interns will assist in developing site plans, manage volunteer work groups, and inventory and monitor forest parameters. People working through the Volunteers-In-Parks program will collect, treat, and plant seeds and other plant materials, operate nurseries, plant seedlings, and maintain plantings.

Support from other park division includes development and delivery of educational and informational materials and programs for park users and park neighbors, consultation and specialized equipment assistance, and assistance in securing equitable service contracts and recovering fair market value of natural products generated as a by-product of forest management.

Forestry is a new program at GGNRA and project statements will be developed that identify the issues, problems, activities, and compliance associated with the program. These projects will be developed during 1995; preliminary projects are listed below.

4.7.1 Inventory Natural Forest Resources

Most of the lands within the park have high natural and cultural resource values. Many of these high values are only known qualitatively and have not been inventoried or documented. Forested areas that likely contain the natural resource values most sensitive to impacts and needing quantification are: Phleger Estate, San Francisco Watershed Lands, Lobos Creek Drainage, El Polin Springs, Muir Woods, Oakwood Valley, Bolinas Ridge, and Lagunitas Creek Drainage.

Inventories are necessary to properly manage these natural forest resources. Information such as vegetative species composition, age and size distribution, special status species presence, use patterns and needs, stand vigor and population dynamics, fuel loading, socio-political management pressures, and threats to natural functioning of forest ecosystems will be collected. Smaller areas can be inventoried on the ground, but larger areas will require remote sensing techniques and use of models, with sampling and ground truthing field work.

These projects can be accomplished by contracts if funding is available, or done by GGNRA staff more slowly. Projects statements will be written and funding sources explored.

4.7.2 Control Non-Native Forest Encroachment into Natural Habitats

Non-native forests have expanded into sensitive native habitats, decreasing park bio-diversity. The plantings of non-native Monterey pine, bluegum, eucalyptus, Monterey cypress, and other tree and shrub species have caused the changes in the microclimate and development in a way that favors non-native plants.

Natural communities threatened by non-native trees will be protected by implementing the following strategy: determine location of invasive trees; determine rates of expansion into the adjacent natural habitats; identify control priorities; evaluate alternative control methods and costs; and implement the most effective control actions.

Areas where forest encroachment on sensitive non-forest habitats is suspected to be a problem include: Milagra Ridge, Lands End, Presidio of San Francisco, Marin Headlands, Mount Tamalpais, Olema Valley. Project statements will be written for these projects. Mapping of these areas can occur by contract or by the park forester. Implementation can be contracted and overseen by park natural resource staff.

4.7.3 Historic Landscape Tree Inventory and Management

Many historic areas of the park were landscaped long ago with trees and other vegetation that have either matured or become senescent and died, fallen down, or been removed.

Different levels of management can occur on these landscapes, but identification and documentation of existing and missing tree components of these landscapes is a basic need. After these landscapes are identified and documented and missing components are characterized. Treatments for preservation, rehabilitation, restoration, and reconstruction all include replacement of identified missing tree components of historic landscapes.

Areas where tree components of historic landscapes are missing include: Fort Funston, Fort Miley, Sutro Heights, Fort Mason, The Presidio of San Francisco, Fort Baker, Fort Cronkhite, Fort Barry, and Olema Valley Ranches. Project statements will be developed and these areas researched using volunteers and interns.

4.7.4 Heritage Landmark Trees Management

Many trees identified during an inventory of historic landscape trees may qualify as Heritage Landmark Trees. Other trees will have to be identified through additional surveys. These trees are threatened by past management practices and possible neglect. They need to be identified and treatment strategies recommended.

A project statement will be written in coordination with cultural resources staff and park landscape architects.

4.7.5 Clarify Forestry Standard Operational Procedures

Standard Operating Procedures (SOP) were completed in 1995 to document physiological, cultural, managerial, and legal directions and limited to vegetation cutting and removal.

Training Sessions will communicate changing arboricultural principles and practices to new and incumbent employees with vegetation cutting responsibilities. Subscriptions to and careful review of professional journals and trade magazines, and participation in training sessions and professional societies are required to keep informed on evolving arboricultural practices. Information gleaned from these publications and meetings will be passed along to appropriate supervisors and employees practicing these skills in the field.

4.7.6 Hazard Tree Management

Hazardous tree conditions exist when a detective tree and a target threatened by that tree defect coexist. The expansion, maturation, and decadence of forests throughout GGNRA lands, due to abiotic factors such as drought and erosion, have adversely affected tree health. This increased in hazard, together with increased visitation and management activity necessitates a comprehensive inventory of hazardous trees in developed areas.

A hazardous tree survey has been completed on the Presidio. Other parts of the park that have trees and targets have not been systematically surveyed. A project statement will be written for a comprehensive survey and treatment recommendations of hazardous tree conditions.

Trees identified as hazardous will be treated by a well-staffed, well-trained, and well-equipped work force. Treatments will include closure of high-hazard areas until hazards are mitigated, physical treatment of hazardous tree defects, and restoration of work sites.

4.8 Range Inventory and Management

Many of the vernacular landscapes of the park evolved with intensive grazing pressures from native ungulates, and later, grazing by domestic stock. Current stock use on lands managed by GGNRA other than equestrian trail use is mostly limited to horse stables and boarding operations. The northern lands, administered by Point Reyes National Seashore, have extensive areas grazed by cattle.

Stock impacts include competition with native animals due to space occupancy and utilization of range herbs and forbs, increased bare exposed soil and physical damage to soil structures, physical damage to riparian corridors and wetlands, compaction of soils resulting in reduced precipitation infiltration and increased runoff and erosion, introduction and spread of non-native plants through feed and bedding straw, and increased nutrient loads in runoff due to feces and urine from stock.

These impacts have been observed at the park, and while it is commonly agreed among natural resource managers that these ranges are often being overutilized, carrying capacities and rest/rotation periods cannot be determined until range conditions, primary production, and utilization are quantified.

Preparation of Ranch Unit Plans will document existing conditions and outline management activities, to ensure that domestic range uses are compatible with General Management Plan objectives. Non-trail stock use occurs in Olema Valley and Bolinas Ridge. These projects are in the northern lands administrated by Point Reyes National Seashore. Equestrian stables in the rest of the park will be evaluated by park staff, and management actions developed and written into permits.

4.9 Prescribed Fire Management

The Golden Gate Fire Management Plan is an addendum to the Natural Resource Management Plan. Prescribed burns are monitored before, during, and after burning according to strict Western Region prescribed fire guidelines. The fire management office monitors burn sites and does not have adequate personnel to meet regional guideline requirements and to monitor additional site-specific elements that may be desirable for answering questions about ecological fire effects that natural resource managers may pose.

Several changes in the vegetative mosaic at the park have occurred due to the suppression of fires. Fire suppression changed the physical processes that shaped the landscape and reduced the area of plant communities that are adapted to fire. This action also increased the areas of plant communities that are fire sensitive. The park therefore has an encroachment of fire sensitive trees, such as Douglas fir, into fire-adapted communities such as chaparral. This is reducing the biodiversity of the park. Fire can be used, in a prescribed manner, to revitalize fire-adapted communities and reduce the encroachment of fire-sensitive trees.

Additional site data on fire effects could assist in resolving natural resource concerns. The fire management office and the natural resource staff will work together to identify additional data gathering opportunities that would likely result in a favorable information/effort ratio. The Golden Gate Fire Management office had a five-year burn plan that ran through 1997. Opportunities are available for suggesting future burn locations, prescriptions, and monitoring of fire effects for inclusion in the future plan.

Natural resources staff reviews the Fire Management Plan and each individual Burn Unit Plan to ensure all natural resource issues have been taken into account. Natural resource staff also participates in planning and implementing the fires. The Fire Management office has the responsibility for writing the Fire Management Plan and implementing the program.

4.10 Aquatic/Hydrology Program

The aquatic/hydrology program focuses on four core areas: inventory and monitoring, aquatic habitat and species protection, aquatic habitat and species restoration, and data management and dissemination.

Outside of the NPS structure, several local, community organizations emphasize fish and habitat protection and restoration as their main goals (e.g., Stream Matrix, Urban Watershed Project, San Francisquito CRMP/Streamkeeper). All groups are working with the park to ensure the well-being of fish and habitat within park boundaries as well as outside. Critical needs identified by these groups include access to equipment for restoration and monitoring and training opportunities in restoration and

monitoring. A key focus of the park's aquatic/hydrology program will be to support community-initiated protection and restoration activities when possible in park areas by providing technical assistance and by addressing critical needs.

The following is an overview of the eight core areas that comprise the aquatic/hydrology program.

4.10.1 Inventory and Monitoring

Inventory and monitoring activities are necessary to detect or predict changes that may require intervention, and to serve as reference points for more altered parts of the environment. Currently, the park is putting together an inventory and monitoring plan in conjunction with Point Reyes National Seashore, The Presidio, and Muir Woods National Monument. For aquatic habitats, the plan is divided into marine, freshwater, and transition ecosystems. Selected biological elements to monitor include the following:

1. Sensitive aquatic wildlife species
2. Indicator species and items (chosen species and items must be sensitive to changes in the environment and management)
3. Trophic level indicator species (primary producer, primary consumer, and top level predator)
4. Non-native species

To track the health of these aquatic habitats, physical and hydrologic processes need to be inventoried and monitored as well. The inventory and monitoring plan proposes the following:

1. Topographic monitoring of wetland and aquatic sites
2. Mapping and assessment of wetland and aquatic sites
3. Streamflow monitoring
4. Wetland inventory
5. Sources and quantity of water use
6. Watershed land use
7. Groundwater monitoring
8. Water quality monitoring

Currently 8 aquatic/marine wildlife species that reside within the park are federally listed as threatened or endangered. An additional 6 aquatic/marine federal species of concern and 1 aquatic/marine California species of special concern also reside in the park.

The current biological inventory and monitoring program focuses on sensitive aquatic wildlife species. For coho salmon and steelhead trout, spawner and redd surveys are being conducted during the winter. Distribution and abundance of juvenile salmonids are conducted on a few streams using snorkel and electrofishing techniques. The tidewater goby is monitored annually in Rodeo Lagoon during the late fall. Winter monitoring of red-legged frog breeding activities using calling, egg mass, and adult surveys are being conducted at several potential breeding sites within the park. Inventories for the California freshwater shrimp are being conducted and the GGNRA has cooperated with the Marin Municipal Water District in their shrimp monitoring program.

Future biological monitoring would expand to include the other three biological elements: indicator species and items, trophic level indicator species, and non-native species. Inventory actions would be prioritized so that data gaps (e.g., freshwater and marine invertebrates) can be filled.

A flexible organizational structure will best accomplish these actions. Because of permitting issues, inventory and monitoring of threatened or endangered species will come under the guidance of the park aquatic ecologist. Because biological inventories are relatively short term and can often require specialized taxonomic skills, we expect to develop and use cooperative agreements with local universities, resource management agencies and research institutions to conduct inventories. Monitoring of physical and hydrologic properties and maintenance of databases would be assisted by Biological and Physical Science technicians.

Related inventory and monitoring project statements are as follows:

GOGA-N-010.000 Research and Write Protection Plan for San Francisco Garter Snake
GOGA-N-019.000 Tidewater Goby Monitoring
GOGA-N-020.000 Inventory Marine and Estuarine Resources
GOGA-N-022.000 Protect, Inventory, and Monitor California Freshwater Shrimp
GOGA-N-023.000 Rare Insect Survey
GOGA-N-025.000 Monitor Marine and Estuarine Resources
GOGA-N-025.001 Monitor Marine and Estuarine Resources — Vegetation
GOGA-N-029.000 Inventory and Monitor Aquatic Resources
GOGA-N-029.001 Inventory and Monitor Aquatic Resources — Amphibians
GOGA-N-029.002 Inventory and Monitor Aquatic Resources — Bivalves
GOGA-N-033.001 Crissy Field — Restoration Monitoring
GOGA-N-046.000 Research Marine and Estuarine Resources
GOGA-N-065.001 Wetland and Aquatic Habitat Inventory
GOGA-N-066.000 Investigation of Poor Water Quality in Rodeo Lagoon
GOGA-N-081.000 Coho Salmon and Steelhead Preservation/Restoration Project
GOGA-N-087.000 Management of Introduced Freshwater Animals

4.10.2 Habitat and Species Protection

Protecting wetland and aquatic habitats and the associated wildlife is the goal of this program. Currently, this includes review of internal and external planning documents, participation in National Environmental Policy Act compliance activities, coordination with resource agencies, providing technical assistance to park staff to mitigate potential impacts, participating in community-initiated protection actions, and developing educational materials for resource protection.

The plan for habitat protection focuses on identifying the types and extent of wetland and aquatic sites (per the classification system of Cowardin et al. [1979]). An important component of the plan is describing the functions and values of the existing wetland and aquatic sites. Much of this information is being obtained from inventory and monitoring activities for sensitive aquatic species. Specific details on wetland planning and protection are listed below in the project summary section.

Species protection largely depends upon the ability to protect habitat for aquatic organisms. Because many aquatic organisms move between park areas and areas under different land management, substantial time will be spent to coordinate resource protection at the watershed scale.

Included in this core area is protection of water quality and quantity — for the intrinsic values of water itself and for the benefits that natural stream flow and water quality provide for aquatic life. Specific details on water quality and quantity are also provided in detail below.

The means to accomplish habitat and species protection will be diverse. For park activities that may affect listed species or critical habitat, Section 7 Endangered Species Act consultations will be initiated. For routine maintenance activities, programmatic Section 7 consultations will be sought. The park's aquatic ecologist and planning/compliance specialist will be responsible for working with other divisions within the park on Endangered Species Act issues. The park's Hydrologist and Physical Science Technician (proposed) will work with Division of Maintenance on erosion issues (see Physical Resources Program, below). To ensure protection of park aquatic resources from external threats, a Stay-in-School position is proposed to interface with Public Affairs and Interpretation on developing public outreach information.

Protecting habitats from external threats depends on strengthening partnerships established with community organizations. Provision of technical services, training activities, and access to Park resources (e.g., hand tools, monitoring equipment) will facilitate protection of aquatic resources. To ensure long-term continuity, the park aquatic ecologist and hydrologist will remain as the key contacts with these community organizations.

The following projects include protection of aquatic habitats that will occur within the next five years:

GOGA-N-022.000 Protect, Inventory, and Monitor California Freshwater Shrimp
GOGA-N-024.000 Range Management
GOGA-N-028.000 Manage Marine Resources
GOGA-N-037.000 Protect and Restore Anadromous Fish in Bolinas
GOGA-N-038.000 Develop Riparian Zone Management Guidelines
GOGA-N-040.000 Protection of Unique Serpentine Bluff Features
GOGA-N-042.000 Lobos Creek Restoration, Protection and Management Plan
GOGA-N-048.001 Development and Assessment of Stables Management Practices
GOGA-N-064.000 Physical Resources Monitoring and Protection
GOGA-N-081.000 Coho Salmon and Steelhead Preservation/Restoration
GOGA-N-087.000 Management of Introduced Freshwater Animals
GOGA-N-101.000 Protect and Restore Freshwater Aquatic Resources

4.10.3 Habitat and Species Restoration

The development of natural areas occurred within park boundaries prior to the establishment of GGNRA. A sizable amount of the park's historic wetland and aquatic sites has been altered. Currently, two major wetland and aquatic restoration projects, Crissy Field and Mountain Lake, are being planned and implemented. Director's Order 77-1 requires the park to identify, where possible, areas where existing facilities have impacted historic wetland and aquatic sites. The intent is to provide a starting point for identifying areas where restoration actions are possible.

The GGNRA program for aquatic habitat restoration will: 1) Use the historic record (e.g., old photos, maps, and text) and/or site potential to provide a general picture of the state of aquatic resources prior to extensive human manipulation, 2) Assess feasibility of restoration actions given costs and benefits, 3) Prioritize restoration actions, 4) Participate in planning for high priority restoration projects, and 5) Implement and monitor actions.

Collection of data to identify existing facilities that impair wetland and aquatic resources will include mapping of historic wetland and aquatic features from old maps, aerial photos, and field surveys. Identification of aquatic species and historic habitat conditions will be obtained from searching museum specimens, scientific literature, oral history, and pictorial data.

Currently, planning and implementation of large aquatic habitat restoration projects are being conducted largely by outside consultants with project management by park staff and/or personnel from the Golden Gate National Parks Association. Because of the long list of potential freshwater and estuarine restoration projects, emphasis will be placed on developing restoration skills with current park staff and by developing long-term relationships with non-profit organizations, universities or resource agencies to ensure that restoration designs meet park goals and objectives at reasonable costs.

High-priority restoration projects are typically tied to those projects that yield sustainable results and produce benefits, direct or indirect, for listed species or species of concern. The aquatic restoration-related project statements are listed below:

GOGA-N-005.000 Redwood Creek Watershed Restoration Project
GOGA-N-033.002 Crissy Field–Tennessee Hollow Plan
GOGA-N-037.000 Protect and Restore Anadromous Fish in Bolinas Lagoon Tributaries
GOGA-N-042.000 Lobos Creek Restoration, Protection and Management Plan
GOGA-N-067.000 Design and Implementation of Aquatic Restoration
GOGA-N-081.000 Coho Salmon and Steelhead Preservation/Restoration Project
GOGA-N-087.001 Habitat Restoration of Tennessee Valley Ponds
GOGA-N-091.000 Mountain Lake Management
GOGA-N-098.000 Oakwood Valley Stream Corridor Rehabilitation
GOGA-N-101.000 Protect and Restore Freshwater Aquatic Resources
GOGA-N-101.001 Lower Wilkins Gulch Floodplain Wetland Restoration
GOGA-N-180.000 Rodeo Lagoon Watershed Restoration
GOGA-N-065.001 Wetland and Aquatic Habitat Inventory

The following project summaries span protection and restoration boundaries and are treated in their entirety below.

4.10.4 Watershed Management

The general philosophy is to approach these areas with a comprehensive watershed management. Where appropriate, watershed management plans will be written. Recommendations for watershed improvement projects will be guided by legislation such as the Clean Water Act, the Wetland Protection Executive Order-11990, NEPA, and other applicable guidance. Brief overviews of some of our watershed management areas are included under the "long-term, multifaceted projects" section of this document.

NPS policies encourage watershed management. Specifically, NPS-77 directs parks to develop water resources management plans that will support decision-making processes related to protection, conservation, use, and management of a park's water resources.

Current threats to GGNRA's watersheds (lakes and streams) include but are not limited to: sedimentation, toxic contamination, eutrophication, habitat fragmentation, urbanization, non-native plant invasion, cumulative impacts, and negative impacts due to internal park activities (bridges, roadways, building projects, grazing, visitor use).

Future watershed planning and restoration projects will address issues such as habitat fragmentation, migration corridors and barriers, bioregions (Point Reyes, State Parks, Watershed land coordination), cumulative effects of many small projects, and improvement natural biodiversity. A special emphasis will be put on promoting an interdisciplinary approach. The Mountain Lake Restoration Plan will be a future priority since it is the only natural lake managed by GGNRA.

Project statements that relate directly to watershed management include:

GOGA-N-042.000	Lobos Creek Restoration
GOGA-N-091.000	Mountain Lake Restoration, Protection and Management
GOGA-N-033.002	Tennessee Hollow Riparian Restoration
GOGA-N-180.000	Rodeo Lagoon Watershed Restoration
GOGA-N-005.000	Redwood Creek Watershed Restoration
GOGA-N-O	Lagunitas Creek Planning
GOGA-N-038.000	Develop Riparian Zone Management Guidelines
GOGA-N-024.000	Range Management
GOGA-N-048	Locate Sources of Contaminants
GOGA-N-039	Habitat Fragmentation
GOGA-N-036	Document Historic Trends in Ecosystems
GOGA-N-041	Manage Olema Valley/Creek
GOGA-N-087.001	Habitat Restoration of Tennessee Valley Ponds
GOGA-N-073	Coho Salmon/Steelhead Trout Preservation
GOGA-N-001	Control of Alien Plant Species
GOGA-N-002	Survey and Mitigate Erosion
GOGA-N-098.000	Oakwood Valley Stream Corridor Rehabilitation
GOGA-N-066.000	Investigation of Poor Water Quality in Rodeo Lagoon
GOGA-N-048.001	Stables Management Practices
GOGA-N-038.000	Develop Riparian Zone Management Guidelines

4.10.5 Wetland System Restoration and Protection

Wetland systems are among the most productive and threatened habitats in the park. Many of these habitats have been lost, while others are threatened by water diversions, sedimentation, agricultural uses, fragmentation, urban development, and water contamination. The Clean Water Act and NPS policy mandates "no net loss of wetlands" as defined by both acreage and function. Parks are also required to restore wetland function where it has been harmed by previous human actions (Guidelines for Natural Resource Management in the National Park Service, NPS-77).

The GGNRA program for wetlands protection and restoration includes: 1) identification of all wetland resources, 2) avoidance of actions that adversely impact wetlands, and 3) restoration and enhancement of wetland values wherever possible. All waters that flow into wetlands are similarly protected and the highest possible water quality standards will be met in these upstream waters.

Wetland protection and enhancement projects are proposed at Big Lagoon (Redwood Creek drainage), Rodeo Lagoon, and Crissy Field. Future projects may include Giacomini Ranch, Bolinas Lagoon, Tennessee Valley, and Eskoot Creek. At these sites, water quality will be monitored, wetland profiles and hydrologic function will be restored, sediment sources will be identified and mitigated, and aquatic resources will be enhanced. Wetland interpretation and education will also be improved by developing in-park wetland training, visitor information, and signing of sensitive habitats.

Project statements directly related to wetland restoration and protection include:

GOGA-N-048.000	Water Quality Monitoring Program
GOGA-N-012	Big Lagoon Restoration
GOGA-N-180.000	Rodeo Lagoon Restoration
GOGA-N-033	Restore Wetlands at Crissy Field
GOGA-N-020.000	Inventory and Monitor Aquatic Resources
GOGA-N-067	Compile Natural Resource Information
GOGA-N-002.000	Survey and Mitigate Erosion
GOGA-N-065.001	Wetland and Aquatic Habitat Inventory

Contracts can be let for the planning efforts. The programs will be complicated and will need special funding for implementation of each particular component.

4.10.6 Protection and Restoration of Water Quality and Quantity

Numerous water quality and quantity issues have been identified at GGNRA. These threats include surface water diversion, groundwater/aquifer depletion, water contamination (e.g., urban runoff, sewage, agricultural nonpoint source pollution, toxic materials including pesticides and herbicides, and sedimentation), and changes in physico-chemical factors such as pH, temperature, dissolved oxygen, and turbidity.

Water quality and quantity (proper hydrologic regimes) are the primary factors governing the health of our aquatic systems. Lakes, springs, streams, wetlands, and oceans are fundamentally linked to all other natural resource systems within the park. Plants and animals depend on water. Most of the park's endangered species are dependent on aquatic systems during some portion of their life. Water resources also provide recreation and inspiration to park visitors.

Strategies for protecting and improving water quality include water quality monitoring and management; establishing special protection zones within watersheds; identifying non-point source pollution; developing sustainable stables management practices; providing educational and interpretive programs focusing on watershed themes, conducting beach cleanup programs; and reducing the potential for pollution of aquatic systems. Enforcement will also be strengthened according to the guidance provided by State and Federal Clean Water programs.

Strategies for maintaining adequate flows and protecting natural hydrologic regimes include inventorying water rights, protecting groundwater, removing diversion structures, water conservation, and enforcing water rights. Working with local communities regarding water issues is important to successfully protect instream flows for aquatic life.

Project statements directly related to protecting and enhancing water quality and quantity include:

GOGA-N-037.000	Protect and Restore Andromous Fish in Bolinas Lagoon Tributaries
GOGA-N-048.000	Establish Water Quality Monitoring Program
GOGA-N-027	Inventory Water Rights
GOGA-N-038.000	Develop Riparian Zone Management Guidelines
GOGA-N-005.000	Redwood Creek Watershed Planning
GOGA-N-002.000	Survey and Mitigate Erosion
GOGA-N-065.000	Develop Water Resources Atlas
GOGA-N-024.000	Range Management
GOGA-N-028.000	Manage Marine Resources

4.10.7 Water Conservation, Recycling, and Sustainable Use

The water resources projects under this heading are part of the larger interdisciplinary program. They are in the spirit of the NPS's publication *Guiding Principles of Sustainable Design*. The goal of projects under this category is to create within GGNRA a model of environmental sustainability.

Threats associated with not developing this program include lowered water tables, water supply shortages, water quality degradation, and extinction of plants and animals.

Strategies for addressing these threats are all based on reducing consumption. Specific water conservation strategies include using low-flow toilets (toilets are the largest household water use), developing efficient irrigation systems, using drought tolerant landscaping, hooking up to reclaimed water systems, identifying leaks in piping, and educating water users. Another strategy is to develop demonstration areas at locations such as the Presidio Golf Course, Muir Beach, and Fort Mason. Tenants and other park partners should be required to comply with this program.

Project statements that address this program include:

GOGA-N-065.000 Water Resources Atlas for the Park
GOGA-N-042.000 Lobos Creek Restoration, Protection and Management Plan
GOGA-N-006.000 Resolve Human/Natural Resource Conflicts

4.10.8 Data and Collection Management

The park's collection includes very few aquatic specimens. Basic aquatic inventory efforts will be required to establish reference or voucher collections. The collections will be composed of either properly preserved specimens or photographs and include supporting data. The description of these efforts is provided within the park's Collection Management Plan.

GOGA-C-010.000 Catalog Museum and Archival Collections
GOGA-C-029.004 Maintain and Upgrade Museum Collections — Manage Collection

Field data from park sampling activities, as well as those by non-NPS scientists, need to be stored in an accessible database. Currently, lists of aquatic species such as marine invertebrates, marine algae and plants, freshwater algae, freshwater and marine fishes, and sensitive species, are being maintained in a simple database. Possible future plans include providing the general public access to the data via the Internet. GIS support is required to link database to maps to show spatial relationships.

To accomplish these tasks, the biological, hydrological and physical science technicians would be responsible for maintaining collected field data and external data in park databases. The park aquatic ecologist and hydrologist would be responsible for ensuring linkage with the GIS program and quality control of databases. Collections will likely be added on an ad hoc basis, as a by-product of future inventory actions. Any contracts or cooperative agreements will include standards for the proper preservation and labeling of specimens.

Project statements related to aquatic data management include:

GOGA-N-014.000 Geographic Information System Development
GOGA-N-065.000 Water Resources Atlas for the Park
GOGA-N-065.001 Wetland and Aquatic Habitat Inventory
GOGA-N-081.000 Coho Salmon and Steelhead Preservation/Restoration

GOGA-N-029.000 Inventory and Monitor Aquatic Resources
GOGA-N-020.000 Inventory Marine and Estuarine Resources
GOGA-N-025.000 Monitor Marine and Estuarine Resources
GOGA-N-028.000 Water Quality Monitoring Program

4.11 Physical Resources Program

The park's physical resources include geologic features and processes, soils, water, air, weather, natural quiet and dark night skies. These provide the support for the diverse habitats and ecosystems within the park. They also affect the safety and enjoyment of park visitors. The physical resources program is focused on understanding, preservation, protection and sustainable management of these resources within the context of the park activities and environment. Water resources are primarily addressed under the Aquatic/Hydrology Program, above.

There are opportunities for cooperation with Interpretation, Facilities Engineering and Maintenance, Roads and Trails, and Resource Protection, as well as with the Presidio Trust staff. Assistance may be available through college and university programs, NPS regional support, Water Resources Division, Geologic Resources Division, and other agencies (e.g., USGS, National Oceanic and Atmospheric Administration/National Weather Service, Bay Area Air Quality Management District, California Division of Mines and Geology). The following projects are designed to improve physical resource management.

4.11.1 Erosion Control

Past land use practices have altered vegetative composition, aggravated and increased soil erosion, and have precipitated landslide activity and ongoing gully formation. These practices have contributed to increased sediment loads in streams and bays, the loss of large quantities of top soil, compaction of soils, prominent visual scars, and ongoing, recurring trail, road and facility maintenance costs. The worst and most obvious problems include trail and road erosion, grazing and riparian trampling, and gully formation.

The erosion control program should be expanded to address such issues as identifying potential slide and mass failure areas, rehabilitating roads, coordinating with the trail program, identifying areas causing sedimentation to park waters, and identifying impacts from grazing. Once soil erosion problems are identified, corrective measures can be implemented according to park priorities.

Project statements related directly to soil erosion include:

GOGA-N-002.000	Survey and Mitigate Erosion
GOGA-N-024.000	Range Management
GOGA-N-018.000	Monitor Beach Erosion
GOGA-N-008	Trail Planning and Maintenance
GOGA-N-077	Ecological Monitoring
GOGA-N-048.001	Stables Management

4.11.2 Coastal Processes

GGNRA's coastline is a resource of regional and national significance. The prevailing California current brings to the surface an upwelling of rich, deep, nutrient-laden water which provides for a highly productive environment for planktonic organisms. These conditions have led to a unique association of

subtidal and oceanic species, including an exceptional assortment of algae, invertebrates, fishes, marine mammals and seabirds. The Gulf of the Farallones National Marine Sanctuary is adjacent to GGNRA's coastline and extends offshore 53 miles. A wide variety of sea life is protected in the sanctuary. The coastline is also included in the United Nations Biosphere Reserve. This is the only reserve which includes a coastal interface.

Threats to our coastline include oil spill contamination, water pollution, disruption of coastal dynamics, erosion, heavy recreational use, dumping and dredge disposal, and overharvest of marine resources.

A strategy for the protection of coastal resources will be initiated. Limited staffing has slowed the implementation of this project.

Project statements which relate directly to coastal concerns include:

GOGA-N-018.000	Monitor Beach Erosion
GOGA-N-025.000	Monitor Marine and Estuarine Resources
GOGA-N-028.000	Manage Marine Resources
GOGA-N-048.000	Establish Water Quality Monitoring Program
GOGA-N-046.000	Research Marine and Estuarine Resources

4.11.3 Physical Resources Monitoring and Protection

Programs to monitor and protect geologic features and processes, soils, water, air, weather/climate, natural quiet and dark night skies will be developed and implemented through the Inventory and Monitoring Program. Projects include:

GOGA-N-087.002	Restoring Ecosystem Function to Valley Soils
GOGA-N-033.001	Crissy Field Restoration Monitoring
GOGA-N-064.000	Physical Resources Monitoring and Protection
GOGA-N-040.000	Protection of Unique Serpentine Bluff Features
GOGA-N-065.000	Water Resources Atlas for the Park
GOGA-N-028.000	Manage Marine Resources
GOGA-N-006.000	Resolve Human/Natural Resource Conflicts

4.12 Geographic Information System (GIS) Program

The GIS program serves all park programs. GIS provides maps that are integrated with data points, enabling the user to have much information at his/her fingertips. Maps of different landscape topics such as vegetation and bird nesting can be overlaid together to give the user visual information that can assist in planning and management.

It is important that the GIS program be integrated and maintain a close link with the rest of the Information Technology Management groups in the park, specifically Information Technology Management Systems. Links to other ArcView users, CAD users and planners is also important. The GIS program has 5 elements: Hardware and Software, Data Development, Applications (Data Use), Training and Integration parkwide and GIS Planning.

4.12.1 Hardware/Software

GIS hardware and software has become less expensive, faster and easier to use in the last several years. Declining prices have allowed the GIS program to budget for equipment replacement and supplies

without requests for additional funding. Also, based on past experience, the program has dropped maintenance contracts of all hardware and most software due to high cost. However, certain program items are still very expensive (plotters, remote sensing software, GPS receivers) and can only be obtained through special funding.

GPS and GIS software has acquired a friendlier interface and better integration with standard office software such as Adobe and MS Office products. GPS data retrieval is faster and more foolproof. The widespread use of ArcView software has enabled staff to browse available data as well as create needed data (though multiple data creators entail a greater need for data documentation and coordination).

4.12.2 Data Development

The programs for GIS use have recently become more abundant, more accurate and easier to acquire. ArcView allows staff to create custom maps, and the Internet allows for a wide variety of data free of charge. GGNRA coordinates with the USGS and other agencies so that the data are readily available. Local agencies are creating their own data for sale (San Francisco and Marin County base data) which provides more local information for our use.

The GIS program has shared data with Marin Municipal Water District, San Francisco State University, the County of Marin and state parks. This has led to reciprocal data trades or discounts on purchased data sets. GIS project money has funded data purchase and data development. A cooperative agreement with the USGS has led to more informal agreements for custom dataset development.

This quantity of data requires metadata (information about a particular dataset) to keep things straight. As of fiscal year 2000, metadata development will be necessary to request GIS funds from NPS sources. Regional data must have federally compliant metadata for parks to receive GIS funding. Metadata creation is a huge job and will require additional staff resources. One objective of this program is to begin having metadata entered into the system at the same time other data is being entered. This is the most efficient and accurate way for metadata to be accumulated for any particular dataset. A standard form and database will be developed to accomplish this.

Funding will also be contingent on regional contributions to the GIS data clearinghouse located on the Internet. This clearinghouse makes basic park data available to anyone with Internet access, and is part of a federal mandate to share publicly funded data.

4.12.3 Applications

Applications are the essence of the GIS program. Better software and data have widened the scope of possible GIS applications. A few examples include: habitat analysis, site suitability studies, viewshed analysis, fire program support, scenario modeling, and change detection. A pending application will link the extensive restoration database to ArcView to allow for report creation and map production from a wealth of field material.

Future availability of satellite imagery and improved sophistication of image processing software will make image analysis a more viable and time saving enterprise in the next few years. Hyperspectral imagery analysis will allow the park to target specific spectral signatures and remotely map plant locations as needed.

4.12.4 Integration

Integration, or the sharing of information, techniques and results is the final aspect of the GIS program. Integration takes on two forms: sharing the GIS information itself and sharing of GIS knowledge through teaching potential GIS users.

Integration of GIS information within the park can be well served by an internal web page (intranet) that houses park data along with a wide assortment of supplemental information to assist in understanding a particular project. This type of clearinghouse can also serve as an archive of projects as time goes on and will help with interdivisional communication. The parkwide clearinghouse will serve a similar function at a national level.

A future scenario of complete integration with adjoining agencies and stakeholders (GIS programs at Redwood National Park and Grand Canyon National Park) will be more achievable at GGNRA with improvements in personal and computer-based networking.

Integration of knowledge of how to use a GIS system occurs through the development of interns — seasonal and permanent employees who are required to enter data into the system as a part of their responsibilities. This is an ongoing program due to the lack of permanent assistance in developing the data within the GIS program itself. The GIS program relies on other park staff and volunteers to collect accurate data to add to the system.

4.12.5 GIS Planning

The development of a GIS Plan will best facilitate the growth of the GIS Program. Applications will be tied to a plan, which in turn is driven by resource/project needs articulated in project descriptions. A 5-year goal of the program is to develop such a plan and begin to implement it.

Project statements related to the GIS Program:

GOGA-N-014.000 Geographic Information System
GOGA-N-014.001 Geographic Information System — Vegetation Information Management Program
GOGA-N-014.002 Geographic Information System — Linking ArcView to Restoration Database
GOGA-N-014.003 Geographic Information System — Metadata Development

4.13 Research Program

Science is a valuable, ongoing part of the Natural Resources Management Program at the GGNRA. Through partnerships with the USGS Biological Resources Division, the Golden Gate National Parks Association and many academic and research institutions, the GGNRA reaches out to the broader scientific community to ensure that the most effective science can be attained in the park, given existing resources. The goal is to have reliable scientific information available for decision-making, problem identification, interpretation, planning and policy needs, at all levels of the organization.

A network of routine advisors and informal science partnerships have developed. At this time, contacts include: 23 aquatic specialists, 5 geology/soils scientists, 20 vegetation specialists, 69 wildlife specialists, a social scientist and an economist. These links allow for a quick assessments of issues at hand, and allow for a breadth of scientific support for the park, including such activities as conducting research, proposal development, and peer review of protocols and proposals. Additional linkages occur

through the local environmental organizations such as the California Native Plant Society and the Audobon Society.

The USGS Biological Resources Division provides a research arm to the NPS and contributes resources to a variety of natural resources research in the GGNRA. The Golden Gate Field Station employs a full-time Research Ecologist, Judd A. Howell, Ph.D. He performs both park-sponsored research and assists the park with many research needs identified, through consultation. Dr. Howell is also an adjunct professor at Humbolt State University. Mike Saiki, Ph.D., with USGS Biological Resources Division, has developed proposals for several aquatic research projects at GGNRA. Roger Hothem serves as the research scientist evaluating black-crowned night herons on Alcatraz Island, as a biological indicator to the health of the San Francisco Bay. Gary Fellers, Ph.D., is assisting with bat and amphibian research in the park, and Erran Seaman, Ph.D., is assisting with the spotted owl research.

Currently research and collecting permits are handled through a joint program of the park's Special Park Uses Office, the Project Review process and the Natural Resources Management staff. The Special Park Uses Office handles the paperwork and tracking, the Project Review Process ensures appropriate review and compliance, and the Natural Resources Management staff serves as liaisons between the park and the outside scientists. The process is still new and developing.

The basic thrust of the 1998 National Parks Omnibus Bill, Title II, is acknowledging the importance of adequate, scientific information for decision-making in park management. It includes additional cooperative agreement authority that not only authorizes, but directs, the Secretary of the Interior to enter into agreements with colleges and universities. It also has a requirement to keep an administrative record of how resource studies have been considered in making decisions on actions that may adversely affect a park resource, a requirement that the conditions of park resources be a significant consideration in superintendents' performance evaluations, and a provision that information on the nature and extent of sensitive resource information can be withheld to protect these resources.

Title II also mandates an inventory and monitoring program as well as research.

The following needs have been identified to implement the research section of the bill:

- Create a systematic method of requesting and documenting research needs, prioritizing and achieving them.
- Develop formal cooperative agreements with research institutions to allow for easier distribution of funds.
- Create an effective process to administer cooperative agreements, write grant requests, complete the Annual Investigators' Report, keep the project statements current, and update the Natural Resources Bibliography, issue and keep track of research and collecting permits and input GIS data into systems.
- Identify funding sources for science and research projects.
- Acquire technical assistance support for sampling design and statistical analysis.

The Research Program will be developed to fulfill these needs. A full-time science coordinator is necessary to begin the process. The coordinator would support staff and management needs in science

by developing agreements with local research institutions, writing grants and assisting with funding projects and overseeing the Research and Collecting permit process.

Although many scientists are partnering with the park in small ways, formal agreements with a select group of research institutions will facilitate easier access to research. They will allow for exchange of funds and joint grant proposals. The science coordinator will research the various options, write the agreements, facilitate signatures and match up projects as necessary.

The program objectives are as follows:

1. To identify and evaluate the condition of biological species, habitats and natural processes in the park.

2. To inventory park ecosystems and to develop monitoring strategies that detect changes caused by natural and human sources. Once the initial monitoring protocol is established, management programs will be implemented.

3. To contribute to the definition of the park's natural resources issues and appropriate management of them.

4. To develop an understanding of the dynamic processes affecting the physical and biological resources of the park and their relationship to the cultural landscape.

5. To coordinate research with universities and other institutions.

4.14 Special Ecological Areas

A special ecological area (SEA) is the identified area in each ecological community type that is most biologically intact and diverse and in the case of grassland and lagoon in the park, represent the only example. SEAs are selected for their biological values. Communities currently represented include perennial grassland, coastal scrub, chaparral, oak woodland, redwood forest, foredune community, coastal strand community, serpentine grassland, riparian forest, estuarian community, fresh water pond community, aquatic stream community and the intertidal community. The creation of SEAs is not intended to discount the biological value of other natural resources zones within the GGNRA and does not exclude management activities in other park areas. One such area in each plant community will be designated to ensure the protection and maintenance of ecological diversity and processes.

The natural resources are the highest priority in these areas. Other uses, therefore, must be documented as having little to no impact on these particular ecosystems prior to use approval. Dogs, bicycles and off-trail hiking are to be excluded from these areas due to possible conflict with vegetation and wildlife. Equestrian use and park vehicle traffic are limited.

Management concerns such as non-native species control, erosion, and water quantity and quality, have a high priority for implementation in these areas. Emphasis will be made to expand this management into the buffer areas bordering SEAs.

Identified SEAs include:

1. The Wolf Ridge area between the Gerbode and Tennessee valleys for the perennial grassland and coastal scrub plant communities.

2. The northeast facing slope of Muir Woods National Monument redwood forest community.
3. Rodeo Lagoon estuarine community.
4. Bolinas Ridge chaparral community and oak woodland community.
5. Beach/Presidio serpentine and Bolinas Ridge serpentine (Cheda Ranch) for the rare serpentine grasslands which are the last refuges for many rare and sensitive native plant species.
6. Crissy Field dune community.
7. Baker Beach coastal strand community.
8. Redwood Creek aquatic, stream and riparian communities.
9. Intertidal communities in Slide Ranch (north end) and Bird Rock (in the Marin Headlands).

5 STAFFING PLAN FOR GGNRA NATURAL RESOURCE MANAGEMENT

5.1 Base Needs as Allocated by R-MAP

The National Park Service underwent a survey of values and threats to resources in 1994 to determine staffing needs based on quantitative analysis of resource values and threats. R-MAP identifies the workload associated with conducting a comprehensive natural resources management program. R-MAP's outputs are in full-time positions (FTE), although it is recognized that the need will not necessarily all be met with permanent NPS employees. Management ascertains the most effective and efficient combination of permanent staff, seasonal or temporary staff, and contracted labor to best meet the park needs.

The preliminary R-MAP analysis allocates a total of 49.4 FTE to conduct a comprehensive natural resources management program at GGNRA. This does not include the resource protection function which is projected by V-RAP. It also does not include the research function, except for science consultation and oversight. R-MAP identifies the workload associated with actually conducting the research needed by GGNRA to be 7.3 FTE. Under the DOI's current organization, this need will be met through USGS-BRD. In addition to the 49.4 FTEs, R-MAP allocates a division chief, four branch chiefs, and 7.5 FTE for clerical staff. These positions are distributed in the R-Map analysis as described below.

5.2 Staffing Organization

Through working with the recommendations of R-MAP, the following staffing plan is recommended:

DIVISION CHIEF: GS-13

Secretary: GS-5 (Serves Division Chief, Assistant Division Chiefs, & Science Advisor)

Clerk: GS-4; 0.5 FTE (Could be seasonal or part-time permanent)

Science Advisor: GS-13

Branch Chief, Vegetation Program: GS-12 (Terrestrial vegetation management, inventory and monitoring, disturbed area rehabilitation, and tree hazard management)

Secretary: GS-5

Plant Ecologist: GS-11 (Non-native plant control program supervisor: responsible for non-native terrestrial plant management and monitoring; restoration of non-native plant removal activities, responsible for planning and compliance issues related to exotic plant management)

Plant Ecologist/Botanist: GS-9 (Program leader, habitat restoration team: assists with native and non-native terrestrial plant management and monitoring)

Plant Ecologist/Botanist: GS-9 (Program leader, non-native plants — special plant leader: assists with native and non-native terrestrial plant management and monitoring)

Plant Ecologist: GS-09 (Program leader site stewardship)

Biological Technician: GS-07 (Habitat restoration team)

Biological Technical: GS-07 (Special plant leader)

Biological Technician: GS-07; 0.4 FTE (Agricultural/visitor use)

Plant Ecologist: GS-11 (Vegetation monitoring supervisor/vital signs — long-term monitoring: responsible for monitoring, vital signs, aquatic plants, rare plant monitoring)

Plant Ecologist: GS-09 (Plant ecologist, terrestrial plant long-term monitoring)

Plant Ecologist: GS-09; 0.5 FTE (Rare plant monitoring)

Plant Ecologist: GS-09 (Aquatic plant specialist: long-term monitoring)

Forester/Plant Ecologist: GS-11 (Vegetation management program supervisor: responsible for vegetation management, tree hazard management; responsible for planning and compliance issues related to tree hazard management, disturbed land revegation)

Forester: GS-09 (Tree hazard management)

Forester: GS-07 (Tree hazard management)

Plant Ecologist: GS-09 (Fire ecologist and fire effects monitoring)

Biological Technician: GS-05; 0.4 FTE (Fire effects monitoring — seasonal)

Branch Chief, Wildlife and Hazard Management: GS-12 (Wildlife management, grazing management and fencing, agricultural use management, integrated pest management and hazardous waste management)

Secretary: GS-5

Wildlife Biologist: GS-11 (Terrestrial wildlife monitoring: responsible for native and exotic terrestrial animal monitoring and management; responsible for planning and compliance issues related to native and exotic terrestrial animal monitoring and management)

Biological Technician: 0.6 FTE (Wildlife monitoring — seasonal)

Aquatic Biologist: GS-11 (Aquatic species monitoring: responsible for native, TES, and exotic aquatic plant and animal management and monitoring; responsible for planning and compliance issues related to aquatic plant and animal management)

Biological Technician: GS-07; 0.8 FTE (Aquatic monitoring — seasonal)

Fisheries Biologist: GS-07; 0.8 FTE (Fisheries management — seasonal)

Wildlife Ecologist/Biologist: GS-11 (Rare species monitoring program leader: responsible for terrestrial TES animal management and monitoring; responsible for planning and compliance issues related to terrestrial TES animal management)

Wildlife Ecologist/Biologist: GS-09 (Rare species monitoring)

Biological Technician: 0.8 FTE (Rare species monitoring — seasonal)

Wildlife Biologist: GS-7/9 (Responsible for grazing management and fencing; disturbed lands)

Wildlife Ecologist/Biologist: GS-11 (Wildlife management program manager: responsible for integrated pest management, agricultural use management, and hazardous waste management; responsible for planning and compliance issues related to pest management, agricultural use management, and hazardous waste management)

Wildlife Ecologist: GS-09 (Non-native wildlife specialist)

Biological Technician: GS-07 (Non-native wildlife management)

Forestry Technician: GS-07 (Pig and other large animal management; pig fence maintenance)

Integrated Pest Management Specialist: GS-09 (IPM program coordinator)

Biological Technician: GS-07; 0.7 FTE (Integrated pest management — seasonal)

Wildlife Ecologist: GS-09 (Rare species management: works with park personnel and habitat restoration programs)

Environmental Protection Specialist: GS-7/9 (Assists with pest management, agricultural use management, and hazardous waste management) (Reports to Planning)

Branch Chief, Physical Sciences: GS-12 (Air, water and geologic resources management; planning and compliance, and collections and data management; also responsible for integration of all vital signs monitoring)

Secretary: GS-5

Hydrologist: GS-11 (Water quality program manager — responsible for water resources management; responsible for planning and compliance issues related to water resources management)

Hydrologic Technician: GS-07 (Water quality (freshwater))

Hydrologic Technician: GS-07 (Water quality management and monitoring (marine))

Hydrologic Technician: GS-07 (Water quality and water rights; water quality data collection — seasonal)

Physical Scientist: GS-11 (Geologic resources program manager: responsible for air resource management and geologic resources management; responsible for planning and compliance issues related to air and geologic resource management)

Geologist: GS-09 (Landfill and hazardous waste management)

Geologic Technician: GS-07; 0.6 FTE (Landfill and hazardous waste management)

Restoration Specialist: GS-11 (Disturbed lands program leader: responsible for disturbed area rehabilitation; responsible for planning and compliance issues related to disturbed area rehabilitation)

Geologist/Restoration Specialist: GS-09 (Other disturbed lands — assists with disturbed area rehabilitation)

Geologic Technician: GS-09 (Roads and trails rehabilitation)

Geologic Technician: GS-07 (Roads and trails rehabilitation)

Branch Chief, Resource Information and Communications/Data Management: GS-12

Secretary: GS-05

Geographic Information Systems (GIS) Specialist: GS-11 (Responsible for GIS)

Data Management Specialist: GS-11 (Responsible for other data management)

GIS Technician: GS-7/9 (Assists with GIS and other data management)

Natural Resources Interpreter: GS-09 (Center for resources interpretation: responsible for interpretation to resolve natural resource issues)

GIS Technician: GS-07 (Clerical and data entry support for GIS programming)

Curator/Librarian: GS-09; 0.7 FTE (Library and collections management — seasonal: responsible for natural resources collections and library cataloguing, curation, and care; assists with interpretation, planning, and compliance)

Natural Resources Management Specialist: GS-09 (Project review/environmental compliance: responsible for coordinating all planning and compliance activities)

Biological Technician: GS-07 (Assist with environmental compliance and project review)

Note: R-MAP allocates an additional 0.1 FTE to GGNRA for paleontological resources management. Rather than assign this responsibility as a collateral duty, it might be best to share a paleontologist position with one or more nearby parks (e.g., Point Reyes National Seashore).

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APPENDIX A

APROACH TO NATIVE PLANT HABITAT RESTORATION

The step-by-step approach to native plant habitat restoration in the park is as follows:

1. **Evaluate Conditions.** The condition of natural resources in the park is evaluated on a watershed-by-watershed basis by an interdisciplinary team that includes the park's hydrologist, wildlife specialist, aquatic ecologist, ecologist, and vegetation specialist using an ecosystem approach.

2. **Prioritize Projects.** The highest priority for restoration work is given to regions where adverse conditions threaten special status plant or animal species, according to federal and state laws. The feasibility of implementing restoration is assessed, including budget constraints and political concerns.

3. **Plan.** In collaboration with other divisions, restoration goals and objectives are set. Site data are collected and a restoration action plan is written. Action plans include information on the amount of plant materials needed for restoration. This information is generated from field sampling data that quantifies the composition of the natural vegetation typically found in the surrounding area. The Project Review Committee reviews all restoration projects. Individual project statements will be written for restoration projects requiring special funding.

4. **Gather/Produce Plant Materials.** In adherence with the 1998 GGNRA nursery management guidelines and park propagation manual, plant materials such as seeds and cuttings are gathered and native plants are propagated in park nurseries. Propagation goals for each nursery are set annually according to specific restoration project requirements. Proper seed storage techniques are practiced in accordance with the guidelines. Careful record keeping through the park's restoration database allows for the tracking of plants from seed collection to propagation to outplanting so that methods can be refined, evaluated and improved.

5. **Site Preparation.** Sites/regions are prepared for restoration activities according to restoration action plans. This may involve erosion control, soil treatment, non-native plant removal or the installation of protective fencing and interpretive materials.

6. **Revegetate.** In adherence with the *Western Region 1993 Guidelines for Restoration in Disturbed Areas*, and following the schemes described in the restoration action plans, sites are revegetated with native seed and/or plants.

7. **Document.** All restoration activities are recorded on work performed/revegetation/ nursery/monitoring data sheets and recorded in the park's restoration database.

8. **Maintain.** Follow-up maintenance activities are implemented and evaluated annually, and adjusted based upon the success criteria defined within the restoration project objectives. This is continued until the original (or modified) objectives are achieved. A sustainable level of maintenance activities is then determined.

9. **Monitor.** Photodocumentation is implemented for all restoration activities. For higher levels of monitoring efforts, field sampling protocols are outlined in GGNRA's Vegetation Monitoring Guidelines. If a new protocol is being developed to meet specific objectives, this must be peer-reviewed prior to implementation.

Appendix B
Approach to Non-Native Plant Management

APPENDIX B

APPROACH TO NON-NATIVE PLANT MANAGEMENT

1. Monitor and Prevent New Introductions From Spreading into the Park

New introductions of non-native plants will be prevented by prohibiting the use of contaminated imported topsoil or fill, prohibiting the use of contaminated straw, ensuring that heavy equipment is cleaned before travelling between contaminated and non-contaminated regions, and continuing public education about the threats of non-native plants. Monitoring for the presence of new invasive non-native species is not currently done systematically, and is based upon available resources. Semi-annual monitoring for new non-native plants that could potentially enter the park's boundaries should be carried out. This will be achieved by establishing "survey corridors" such as roads and trails, park boundaries, new project areas, and other disturbed habitats. Park staff will also work with adjacent property owners to control non-native plants on their property, and work to create legislation/policy for prohibiting the sale of noxious plants.

2. Rank the Non-Native Plants of the GGNRA

The top 21 non-native plant species in the park have been determined according to their rate of spread, parkwide occurrence, formation of dense low diversity stands and feasibility of ongoing reduction and control. These species will be ranked during the next three years using a modified version of the analytical procedure outlined in the *Handbook for Ranking Exotic Plants for Management and Control* (Holmes, unpublished Natural Resources Report NPS/NRMWRO/NRR-93/08). Modifying the ranking will require collecting additional data and the review of past data and current literature. Employing this system will ensure that ecological knowledge and complete information are applied to the decision-making process. Based on this system, the greatest control efforts will be directed toward the highest ranking threats.

3. Map Distribution of Important Non-Native Plant Species

GGNRA began surveying and mapping invasive species in 1987. Invasive species surveys and maps serve as an inventory from which managers can identify size and location of a specific weed infestation, track the rate of spread of a species and prioritize and plan for species removal. In 1987 the cover of non-native invasive plants in the Marin Headlands was 135 acres (approximately 1 percent of the total area). Today, one species alone—Cape ivy—dominates more than 67 acres. Populations of eucalyptus, Monterey pine and Monterey cypress were re-mapped and surveyed in 1998. Now 210 stands of these invasive tree species cover 315 acres, approximately 2 percent of the land base. It is estimated that the current total cover of targeted non-native invasive plants in the Marin Headlands is more than 10 percent.

Comprehensive parkwide surveys of targeted species are critically important in prioritizing control efforts. Detailed information is available for approximately 70 percent of the park. Hand-drawn and electronic maps and non-native species surveys have been completed for most units. These data need to be consolidated and reviewed for accuracy. Additional surveys must be completed in watersheds north of Stinson Beach and south of Milagra Ridge. These regions are less visited than the rest of the park and support some of the most intact assemblages of coastal scrub, chaparral and grasslands. Detailed surveys and maps of the current invasive plant threats in these regions are essential.

4. Develop Control Methods for Widespread Target Species

Critical to determining the most appropriate control and/or removal methods for the park's invasive non-native plant species is the collection of biological and ecological information (including identification of patterns of spread, reproductive trends, mature plant biology, etc.), reviewing past literature, and evaluating the effectiveness of the park's current adaptive management control strategies for each species. The completion of these steps has only been undertaken for one species — Cape ivy, the park's highest priority threat. Components of this strategy have been completed for French and Scotch broom, oxeye daisy, eucalyptus, capeweed, cotoneaster, thoroughwort, tall fescue and harding grass. Additional resources are required to complete the necessary research and data collection/evaluation for the park's remaining targeted invasive non-native species.

The compilation of the data/information described above has led to, or will lead to the development of an Integrated Pest Management approach for each species, and a plan of action including treatment alternatives. This information will be summarized in the park's restoration database. Comprehensive files on each species are kept in the Natural Resource Center at Fort Cronkhite.

5. Conduct Research and Review Literature

Critical to a successful integrated management strategy for invasive non-native species is acquiring an ecological understanding of each species, and its ability to respond to particular environmental conditions based upon life history, special adaptations, and ranges of tolerances. Management priorities must be determined based upon ecological criteria and project feasibility. Most of this knowledge is acquired through continued research and adaptive management. GGNRA has conducted and/or participated in several non-native species research projects, focussing primarily on French broom and Cape ivy.

In 1994-1995 GGNRA hosted a California Exotic Pest Plant Council working group on Cape ivy which conducted experiments on its biology and experimental removal methods. A combination of herbicides is more effective at controlling Cape ivy in a eucalyptus forest than hand removal methods; the application of a solarizing layer of clear plastic was unsuccessful in this setting (Bossard and Benefield 1995). A master's thesis on the negative impact of Cape ivy on three plant communities in the park was conducted in 1996-1997(Alvarez and Cushman 1997) and a study of its effects on the abundance of insects for two watersheds was completed in 1997 (Fisher 1997). Research is currently underway to improve the understanding of the dynamics and consequences of French broom invasion into coastal grassland habitat.

Given the current vegetation program's resources, the majority of invasive non-native species research needs remain unmet. Baseline scientific information on the dispersal mechanisms, life history, ecological impacts, and responsiveness to varying control techniques is still needed for approximately 50 percent of the top 21 invasive non-natives within the park.

6. Implement Small-Scale Pilot Projects and Adaptive Management Trials for New Control Treatments/Invasive Species

Invasive non-native plant removal/containment pilot projects will be implemented whenever possible and/or feasible. Past pilot project implementation has been critical for determining

treatment cost, and effectiveness. Pilot projects, on varying scales, have been implemented for the control of the majority of the park's 21 priority invasive threats. The effectiveness of each pilot project and planned control technique is systematically tracked, monitored, and evaluated. Test variations of pre-determined prescriptions in different environments are also implemented to refine control techniques.

To accomplish these and other invasive non-native plant program objectives, the vegetation program works in partnership with the California Exotic Pest Plant Council, the California Native Plant Society, the University of California at Davis and other local colleges, universities and conservation agencies to stay current with the latest knowledge about the ecological impact of invasive non-native plants on native plants and animals, the rates of spread into different habitat types, and the development of more efficient control methods that would strengthen GGNRA's control program.

7. Control High-Priority Localized Populations

To date, approximately 90 percent of the vegetation program's invasive plant control resources have been targeted on approximately 50 percent of the park's land. Priorities and resources have been established based upon ecological parameters, political climate, and centralized human resource availability. The process for this priority setting has not been consistent, or based upon a full knowledge of targeted invasive plant threats. Therefore, staff have been unable to prioritize future management actions effectively. However, once baseline data collection is completed, the park will have a parkwide GIS database of targeted invasive non-native plant species which can be used to prioritize future control efforts and evaluate long-term rates of spread for key species.

Priority containment and removal sites will be identified for each major watershed based on the agreed-upon criteria and ranking. Where targeted invasive non-native plants occur on non-federal lands and are a threat, coordination with land owners will be attempted to maximize control success.

The implementation of invasive non-native plant control projects are conducted primarily by vegetation stewardship program participants. All control efforts are documented and monitored.

8. Educate the Public and Coordinate with Other Agencies

Presentations and training on non-native plant management are given to park employees and the public. Site bulletins describing the biology and control methods of important pests are being developed. In addition, park employees and volunteers are urged to participate in the California Exotic Pest Plant Council. The GGNRA has taken an active role in its working groups, including the pampas grass, French broom, and Cape ivy working groups.

Appendix C
Approach to Rare Plant Management

APPENDIX C

APPROACH TO RARE PLANT MANAGEMENT

1. Compile and Disseminate Information to Gather Baseline Data for Management Priority Setting and to Educate Park Staff

Rare Plant Management Guidelines were developed in 1985 for 23 rare plant species. In 1992 historic populations were resurveyed. The guidelines were then revised in 1994, and included current information on the then 31 rare plants. Guidelines were disseminated throughout the park to both educate park staff, and to prevent incompatible use in the habitats supporting these species. The guidelines include the following information for each species: blooming calendars, specific location maps for each population, a photograph and line drawing, general distribution, a description of the plant, habitat description, existing endangerment factors, management recommendations and a list of information available in the natural resource file. The guidelines are currently being revised to include the now 38 rare plant species.

2. Monitor Populations

Of the 38 special status species in the park, 23 were documented during surveys conducted in 1985. Additional monitoring of rare plants in the Presidio has been conducted annually since 1993. These monitoring efforts have been conducted by California Native Plant Society volunteers, community stewards and park staff, and have provided valuable information on plant species distribution, population size, and trends. Additionally, 6 species were monitored in the northern lands in 1994. Not all taxa, however, have been monitored systematically every year, and numerous new taxa have been added to GGNRA's rare plant list since 1984. In 1998 a parkwide censusing program was implemented and 30 species (including those on the Presidio and in the northern lands) were monitored. This effort involved funds from the Golden Gate National Parks Association and more than 1,600 volunteer hours. In 1999 rare plant censusing efforts expanded to include the San Francisco watershed lands. Seven species, however, still have not been fully censused, and no monitoring efforts have been conducted in the Phleger Estate. Baseline information on population sizes and trends for many of these plants is limited, and has been gathered for less than 5 years.

Surveying for New Populations

Comprehensive field surveys of suitable habitat often result in the discovery of additional populations of known rare plants, which may indicate the species was not as rare as previously believed. Additional surveys may also result in discovery of rare taxa that have not been documented previously in the park, or taxa that have not been previously seen or described at all. In the former case, this information may preempt the need to list a plant; in the latter case, the information ensures that plant taxa that have never been documented are not becoming extinct.

The implementation of a rigorous floristic inventory of vegetation communities that could potential support rare flora is contingent upon funding of a larger comprehensive rare plant management program (GOGA-N-009.000).

Census Taking and Estimating Population Sizes

The 1994 edition of the *Rare Plant Management Guidelines* predicted the censusing needs for each species. It outlines a schedule, census frequency, intensity and timing for each species. The census protocols are compatible with the statewide California Native Plant Society rare plant census protocols, and all data are sent to the CDFG annually.

Effective management of special-status plants requires systematic information on population size fluctuations, as well species ecology and habitat requirements. Without consistent funding to gather this information in a comprehensive manner, resource managers are unable to determine whether a plant population or species is stable, increasing, or decreasing in areal extent or abundance. In 1995 vegetation program staff concluded that the current census methods (noted in the 1994 edition of the *Rare Plant Management Guidelines*), while tracking range and approximate population size, did not adequately determine habitat associations, or track population size and distribution. Efforts are underway to work with local universities to develop a suite of statistically valid monitoring protocols for each guild of rare plants. Current resources have only enabled staff to create a protocol for monitoring annual species, which was field-tested on populations of the San Francisco lessingia. However, in the interim of developing valid monitoring protocols, the vegetation program is censusing all rare species annually to potentially detect gross patterns and trends in rare plant population size. This information will then be used, coupled with more scientifically sound monitoring data, to develop acceptable thresholds of change (e.g., if plant numbers or areal extent of a particular taxon declined by 10 percent or more, management actions would be triggered).

3. Protect Against Impacts

Sixty percent of the park's rare plant habitats are protected against impacts caused by non-native plant invasion, trampling, maintenance activities and fire suppression. Sensitive species that exist in areas subject to trampling by hikers or dogs are fenced. Maps detailing the ranges of all known populations of rare species are provided to the park's compliance branch to ensure that no park activities are incompatible with rare plant management. In 1998, the park's largest rare plant restoration project, Lobos Creek Dunes, completed construction, and interpretive signage, wayside exhibits and boardwalk through the restored habitat will hopefully promote increased public awareness and sensitivity toward the park's rare resources.

Although most of the rare plants occurring within the boundaries of the park are protected from incompatible land use, such protection, in and of itself, does not ensure the recovery and persistence of endangered plant populations. It has been established that after populations are protected from human disturbance, some populations require management to slow, and eventually reverse, their decline (Pavlik 1987). Of particular importance are data on population trends (stability, growth, or decline) and reproductive performance. These data enable managers to determine appropriate management strategies, or adapt existing strategies to protect populations and species at risk of extinction. Detailed, species-specific information on habitat requirements, historic range, mode of reproduction, pollination vectors, and population dynamics also are baseline requirements for any attempts at reintroduction of special-status plants. Additionally, a detailed analysis of the current threats to natural population expansion must be assessed.

4. Research and Literature Reviews

Effective management of these species-at-risk requires information on the basic ecology of the species. Distribution patterns, habitats, and ecological parameters differ for each species. Limited past management activities have provided insight into assessing ecological requirements, as well as ecological opportunities and constraints for species. Some species require active dune blowouts to colonize, some are dependent upon frequent burning, while others prefer a specific microenvironment for optimal population size and vigor. Timing, intensity, and frequency of a proposed activity are key factors in biological evaluations for proposed management activities. To effectively protect existing populations and, if necessary, propagate or reintroduce rare plants to new areas, vegetation program managers require information on the ecological requirements and the life history characteristics of the managed species.

GGNRA has conducted and participated in several rare species research projects, focussing primarily on the federally endangered Presidio clarkia and San Francisco lessingia. In 1997-1998, two San Francisco State University students conducted studies in the Presidio dune communities. One study completed a comparative baseline study of invertebrates at sites within the restoration areas and outside of the restoration activities, comparing relative abundance and species diversity (Lacabanne 1998). The second study examined the negative interaction of non-native grasses and the San Francisco lessingia (Pogge 1998). Current research includes an analysis of the microhabitat requirements for establishment of the Presidio clarkia in restored serpentine grassland habitat.

Given the current vegetation program's resources, the majority of rare plant species research needs remain unmet. Baseline scientific information is still needed for approximately 95 percent of the park's rare plant species.

5. Enhance Rare Plant Populations

Approximately 40 percent of the Vegetation Stewardship Program's field restoration activities are targeted toward the goals of rare or endangered species habitat enhancement and protection. Eighty percent of these efforts are accomplished on the Presidio through the Presidio Park Stewards. Staff and volunteers conduct annual population size estimation/censuses and range mapping for all 12 rare species found on the Presidio. They also conduct research projects that guide management actions for species enhancement (e.g., *Clarkia franciscana* seeding experiment (1998–1999), *Lessingia germanorum* sampling method determination (1998); collect of seeds from rare plant species for direct seeding or propagation (at the Presidio Native Plant Nursery) and outplanting into suitable habitats (in consultation with the U.S. Fish and Wildlife Service, when appropriate); and remove invasive threats. In total, sand dune habitat supporting 5 rare or endangered species has been increased by 31 acres, serpentine grassland habitat supporting the federally endangered Presidio clarkia has increased by 6 acres, and serpentine chaparral habitat supporting 4 rare species has increased by approximately 6 acres through the program's efforts. Habitat enhancement efforts for the Franciscan thistle are underway on the Presidio and in the Marin Headlands. Research efforts include evaluating habitat requirements and identifying areas of re-introduction. Seed and cutting collection and propagation trials have been successfully conducted for 6 rare plant species.

Appendix D
Synthesis of Existing Vegetation Monitoring Program