

GNRA GMP — PWR WORK SESSION BRIEFING

Revised 13 January 2013

Date of Briefing – Wednesday, January 30, 2013, 2:00-2:30 Pacific

DRAFT OUTLINE

0. Purpose (3 min.)
1. Brief Overview of Comment Analysis Process (3 min.)
2. Changes Related to Dogs and the Dog Management Plan/EIS (3 min.)
3. Changes to Management Zoning (3 min.)
4. Changes to Boundary Adjustments (3 min.)
5. Changes Related to Park Operations (3 min.)
6. Changes Related to Waterbird Habitat Protection (3 min.)
7. Specific Changes by Geographic Areas (3 min.)
 - Muir Woods National Monument
 - San Francisco County/City
 - San Mateo County
8. Cost Update (3 min.)
9. Schedule Update and Next Steps (3 min.)

EXPANDED OUTLINE

0. PURPOSE OF BRIEFING (3 MIN.)

- Review the biggest changes to the GMP since the Draft was issued in September 2011
- Summarize the most important/ substantive comments received on the Draft GMP during the public comment period, which concluded in Dec. 2011; present the responses
- Provide an update on the project schedule
- Get conceptual approval of GMP: concurrence on changes, responses and schedule

Note: The presentation will focus on the major changes to the preferred alternative which will be included in the Final GMP/EIS (i.e., changes to the proposed actions) rather than on our comment responses or changes to text. However, we do want to acknowledge whether a particular concern could be controversial, led to a major revision to the GMP, or if we were able to address that concern merely through a written response or minor text revisions.

1. BRIEF OVERVIEW OF COMMENT ANALYSIS PROCESS (3 MIN.)

- **General Info** – Dates for comment period (including the extension), number of comments received, types of organizations who submitted comments, substantive/ nonsubstantive, etc. (this information is easy to find in the summary of the comment analysis report).

- **Analysis/Response Process** – Describe the process we went through in responding to the comments—that a contractor (Louis Berger Group) helped with comment analysis by entering and coding the comments, but that we (NPS planning team) have been very diligent in reading, analyzing, and understanding the comments, confirming and revising the concern statements that LBG drafted, discussing each of the concerns as a team, and agreeing upon changes to the document and/or written responses, as needed. Also, that all along the way we’ve been tracking changes to the GMP that were related to these comments.
- **Comment response topics** – List of the 16 topics under which we grouped the responses and organized the response document; do not read the list.

2. CHANGES RELATED TO DOGS AND THE DOG MANAGEMENT PLAN/EIS (3 MIN.)

- **Summary of Comment** – We received a number of comments that were related to the subject of dogs and dog management at GGNRA (e.g., people were concerned about restrictions that the park may implement in the future). Many of these were comments on the ongoing Dog Management Plan/EIS, and as such, were not substantive comments on the GMP. However, a few letters also expressed concerns about the Draft GMP that we did treat as substantive. In general, these commenters felt that recreation—which in their minds was the primary reason for establishing the GGNRA—was being slighted in the GMP in favor of conservation. They also reacted strongly to the inclusion of the phrase “offering national park experiences” in the purpose statement—some mistook this as a deliberate attempt by NPS to change the fundamental purpose (or “circumvent the legislated purpose”) of GGNRA—i.e. they thought we were seeking national park designation for GGNRA. [REDACTED]
[REDACTED] Some also voiced objection to the management zoning of certain areas—specifically high use dog-walking areas that are proposed “Natural” zones at or near Ocean Beach and Fort Funston.
- **How We Addressed: Biggest Point** – Although many comments on the DGMP were related to dogs, they necessitated very few changes to the preferred alternative. In general, we responded to this group of concerns by crafting carefully thought out written responses (in consultation with EQD who is preparing the Dog Management Plan, and referring to legislation and policies), and making comparatively minor text changes to the GMP.
 - **Purpose** – Perhaps most importantly, we clarified/ asserted that our purpose does not violate the legislated intent of the park.
 - **Recreation/ Visitor Experience** – We also explained that the GMP uses the terms “visitor experience” and “visitor opportunities” to be inclusive of recreation.
 - **Natural Zone** – In our responses, we also clarified the intent of the Natural zone—that it did not imply a pristine wilderness or wildlife refuge. And in the GMP we made some changes to the definition of the Natural zone based upon these comments, for example removing phrases such as “aggressively manage threats” that concerned commenters.
 - **Appropriate Minor Revisions** – We also made several other minor changes to the text, for instance within the descriptions of management zones we revised (somewhat) the list of recreational activities that could occur within those zones, and clarified that these lists were

not exhaustive. One mapping change was made at Fort Funston to reflect current plans for the Dog Management Plan.

3. CHANGES TO MANAGEMENT ZONING (3 MIN.)

We described some of the changes that we made to management zones a moment ago, when we discussed how we responded to the “dog comments.” Some other changes to management zoning include:

- **Sensitive Resources Zone** – We “tightened up our language” to make the zone a bit more restrictive; noting that it is used very sparingly: slopes of Muir Woods, offshore at Alcatraz, Bird Island and Bonita Cove.
- **Sensitive Resources/ Devil’s Slide Area** – In the preferred alternative the offshore environment at Devil’s Slide area will now be zoned “Sensitive Resources” (as in the DGMP Alternative 2) due to comments about impacts to bird colonies.
- **Major Change: Removing Management Zoning from San Francisco Peninsula Watershed Lands** – One major change that we are now making to all action alternatives is that we are no longer applying management zones to the Peninsula Watershed lands.
 - Although NPS **administers** two easements on these lands—a scenic easement and a scenic and recreational easement—the San Francisco Public Utilities Commission (SFPUC) is the agency responsible for management of these lands (i.e., NOT the NPS). SFPUC sent us a very thorough letter expressing many concerns and objections—some of these we really had to think about, and others were quite minor that and were easily addressed through minor changes to text (usually clarifying language).
 - One of their overarching concerns was that the DGMP seemed to misrepresent the two agencies’ respective authorities and management responsibilities for Peninsula Watershed lands. For instance, they objected to the GMP’s description of these areas as “park lands.” We better understand their concerns after having a series of conversations with PUC/ Watershed staff. We are responding to these concerns through written responses, by changing GMP zoning, or through other appropriate (and relatively minor) text changes. In making these revisions, we took pains to consider the tone of the language. For instance, the GMP no longer describes the Watershed as “park lands,” and we now make it clear that any proposed actions would be taken in partnership with SFPUC and in accordance with the language in the easements.
 - The decision to remove management zoning is a response to the SFPUC letter.

4. CHANGES TO BOUNDARY ADJUSTMENTS (3 MIN.)

- **Changed from “Proposed Boundary Adjustments” to “Potential Future Boundary Adjustments”** –In response to concerns raised in WASO and PWR about overlapping boundaries with NOAA sanctuaries, we decided to move the Bolinas lagoon “**Proposed** Boundary Adjustment” from the Draft GMP, to the category of “**Potential** Future Boundary Adjustment” in the Final GMP.

- We are keeping proposal to adjust boundary to extend ¼ **mile offshore in San Mateo County**, overlapping NOAA’s NMS. Zoning will be Scenic Corridor as in Marin and SF. These are consistent with guidance from WASO (Name?) and Region (Sara Allen).
- Also Marin Transit Hub (Offsite Welcome Center) was removed from list
- We are also showing the possible future management zoning for all **proposed** boundary adjustments: Gregerson property, Margins of Rancho, Vallemar Acres (all Natural)

5. CHANGES RELATED TO PARK OPERATIONS (3 MIN.)

- **Centralized Maintenance Facility** – The Presidio Trust submitted a letter with many comments. Most of these did not necessitate changes to the preferred alternative. They did, however, request that the preferred alternative be revised to reflect recent discussions between the Trust and GGNRA regarding the shared centralized maintenance facility within the Presidio Area B.
 - **Big Idea:** We updated the text as requested. However, we kept the text very general to allow for flexibility, given that the park’s position on this centralized maintenance facility (and the condition of the facilities) continues to evolve. We did not specify a particular building, even though one has been discussed with the Trust in the past. (Bldg. 643) We also stated that this proposal would be contingent upon NPS confirmation of feasibility and upon an agreement between the NPS and Trust.
- **Slight Adjustment to Zoning at Alcatraz Island**– In the preferred alternative, we made a slight adjustment to the management zoning in order to simplify access to the maintenance yard. We expanded the “Park Operations” zone to match a fence line so that this zone would extend right up to the Model Industries Building. There was no change in impacts to waterbird habitat (next.)

6. CHANGES RELATED TO WATERBIRD HABITAT (3 MIN.)

- **Concern:** Federal agencies, nonprofit organizations, and individual members of the public expressed concerns regarding adverse effects on waterbird habitat from proposed NPS actions and management zoning (namely on Alcatraz Island, but also at other coastal locations such as Bird Island, Devil's Slide, etc.), including questions regarding the level of analysis of the potential impacts.
- **Response:**
 - Given the broad scope and large geographic scale of this programmatic planning document, the NPS considers the level of habitat impact analysis appropriate. When specific actions identified in the GMP are implemented, the NPS will do further environmental analysis and regulatory compliance at a much more site-specific, detailed level.
 - The “Potential Environmental Consequences” section for Alternative 3 effects on “Habitat (Vegetation and Wildlife)” has been modified to clarify the anticipated impacts (major adverse impacts to western gulls) to waterbird habitat on Alcatraz Island.
 - Through the use of careful biological monitoring and adaptive management measures, (which are identified as Mitigative measures) NPS staff is confident that healthy waterbird colonies can be sustained on the island into the future under the NPS

Preferred Alternative (e.g., use of indicators and standards, including waterbird impact indicators).

- A staff biologist would monitor all park activities and visitation on Alcatraz Island on a daily basis and assess possible impacts to bird habitat. The island biologist is consulted regularly for input on ways to avoid and/or mitigate visitation impacts to birds and waterbird habitat on the island.
- **Sensitive Resources/ Kayaker Concerns** – Kayakers raised concerns related to restricted access to sensitive resources zones, for instance around Bird Island, caused us to narrow the zone to 100 feet (rather than ¼ mile). And we included a sentence in a response on this topic clarifying that in the event of an emergency, personal safety always takes precedence (i.e., a kayaker may land as needed, if their safety is at risk). Retaining Sensitive Resources zoning at Bird Island will help protect colonial seabird habitat.
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- **Document Changes:**
 - Most notably, the “Potential Environmental Consequences” section for the Preferred Alternative 3 effects on “Habitat (Vegetation and Wildlife)” has been modified to clarify the anticipated impacts to waterbird habitat on Alcatraz Island. The edited language draws distinctions between the effects on western gulls (long-term, major, adverse, and localized) and the effects on other waterbird species on Alcatraz Island, mainly due to the rehabilitation of the Parade Ground, opening it to visitors year-round.
 - As mentioned previously, management zoning at Devil's Slide coast under the Preferred Alternative has been changed from "Natural" to "Sensitive Resources".

7. SPECIFIC CHANGES BY GEOGRAPHIC AREA (3 MIN.)

- **Muir Woods National Monument**
 - **Document Change:** The specific proposal to develop an off-site Muir Woods Welcome Center at Manzanita was removed from the preferred alternative, and is restated as a concept that could be implemented with partners at a later date.
- **San Francisco County**
 - **Treatment of historic Pier 4** – We made an important change related to Pier 4 at Fort Mason, clarifying that it would be stabilized under the preferred alternative. This decision was not related to a public comment but corrects an omission of the DGMP. The \$3M cost has some implications for the total cost of the GMP; however we weighed this against omitting mention of this significant resource.
- **San Mateo County**
 - **San Francisco Peninsula Watershed Lands: Concern for Recreational Access** – In their letter SFPUC expressed concerns regarding opening the watershed lands to recreational uses, mentioning the risk of wildfire and potential impacts to special status species.
 - **Document Change:** We kept the proposal for a hikers' huts as part of the Bay Area Ridge Trail, defined them a bit more clearly, explaining that there was no expectation of campfires.
 - **Lack of Emphasis of Funds designated for San Mateo County**

- **Concern:** Members of the public expressed concern over the relatively small dollar amount planned to be spent in the county. Some of the concerns are related to aspirations that GGNRA would devote funds to the Sanchez Adobe, which is a significant resource, but not adjacent to the park, nor deemed appropriate for inclusion at this time.
* A scoping letter from Congresswoman Jackie Speier suggested we develop a visitor center in Pacifica.
- **Response:** We responded that most of the costs in the GMP are related to management of existing resources and facilities (rather than construction of new facilities) and that therefore, there are very significant costs to be dealt with in other areas (e.g., Alcatraz), that already have very high level of NPS infrastructure, and further that there are substantial NR projects identified for NPS lands in the county (invasive species work, etc.), and that the NPS would explore ways to partner programmatically with the Sanchez Adobe.
- **Minor document changes, mostly response.**

8. COST UPDATE (3 MIN.)

- Refresher about sensitivity to costs that was managed prior to release of the DGMP/EIS (Region and WASO involvement; high priority vs. priority projects identified, etc.)
- Summarize the few changes due to 1) revised operational facilities in Presidio Area B [increase], 2) deletion of off-site welcome center for Muir Woods [decrease], and 3) inclusion of Pier 4 stabilization [increase]

9. SCHEDULE UPDATE AND NEXT STEPS (3 MIN.)

- **Updated PA** – At the end of FY12 we updated the project agreement. As part of that process we revised the project schedule to what we felt was realistic (but still fairly ambitious, given the ongoing compliance—especially an NHPA (Section 106) Programmatic Agreement, but also a Statement of Findings for Floodplains.) We are working hard to keep up with the revised schedule, and we anticipate:
 - Tracking down answers to remaining questions and making changes to the document
 - **Admin Draft Final GMP/EIS submitted for Park/Region Review** – end of March, early April 2013
 - **Final GMP/EIS submitted for Permission to Print** – June or July, 2013
 - **NOA for Final GMP/EIS to hit the streets** – September 2013
 - **Sign ROD and NHPA Programmatic Agreement** – November 2013