

Golden Gate NRA

Draft Comment Responses

Draft Comment Responses by Response Topics

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Response Topic 1: “Park Purpose”

Response Topic 2: Recreation “Balancing Recreation and Preservation”

Preservation versus Recreation:

Concern Statements

36637: Commenters, including the Wild Equity Institute, stated that the NPS should make stewardship of the land the priority of the plan, including revisions to the purpose of the Draft GMP to include prioritization for the protection of park resources. **CLARIFICATION:** Comment specifically requests that we include new text in the Purpose and Need explaining that since 1980, the importance of the GGNRA in protecting biodiversity has been studied and much better understood. (see representative quote)

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36638: Commenters stated that the primary purpose of the GGNRA is to provide for public use and enjoyment. They did not agree with the purpose to "offer a national park experience" because of the urban nature of the park, and felt that the park was trying to use the Draft GMP to illegally change the enabling legislation which established the GGNRA for recreation. They further stated that the plan violates previous agreements the NPS made with the various localities. As a result, some commenters felt that the Draft GMP should be considered unlawful. Commenters also stated that recreation should be the highest priority of the GGNRA, suggesting that there should be more emphasis on increasing recreation within the Draft GMP. Further, the GGNRA should not attempt to control or limit visitor access and recreational opportunities. The Dog PAC of San Francisco requested that the language "Aggressively Administer" and "Controlled Access" be removed from the Draft GMP.

36493: One commenter suggested that more emphasis should be provided on recreation rather than restoration, and that instead of focusing on restoring areas, the focus should be on maintaining the current biodiversity and minimizing the extinction of the species that exist today. (Similar to BK1000/36638, same responders)

36377: Commenters stated that the GGNRA did not fulfill contractual responsibilities in 1995 and 2000 when substantial areas of Fort Funston were closed under the pretense of habitat protection for the endangered Bank Swallow.

36588: Commenters stated that the Draft GMP puts too much emphasis on conservation and a backcountry experience that would have an adverse impact on visitors. The San Francisco Dog Owners Group stated that since most of the GGNRA experiences visitation from the local population, requiring permits or having limits on visitation would have an adverse impact on visitor experience, which should be considered in the Draft GMP.

Response

As stated in both the Summary Edition and Volume 1 of the draft GMP, the context within which GOGA was initially crafted has since changed. Laws and mandates concerning the National Park Service have also changed over time, shifting how units in the national park system are managed, particularly concerning protection of resources. Increased public demand for access to, and use of, open spaces within Golden Gate National Recreation Area has to be balanced with mandates and needs for the preservation of resources. As an urban park, the purpose of Golden Gate NRA is closely tied to access and use of resources within its boundary. Simultaneously, the park service is mandated to ensure that those resources, both natural and cultural, remain unimpaired. The executive summary contained in Volume I of the DGMP has been updated to include further clarifying language concerning existing National Park Service wide legislation and management policies. It is important to state that the purpose of Golden Gate National Recreation Area is not being altered in this plan. However, legislation and mandates require actions of preservation concerning resources take precedence over opportunities for recreational uses. As directed in 2006 National Park Service Management Policies, this emphasis of preservation is necessary to ensure that the enjoyment of resources will be possible for a breadth of both current and future national park visitors. The balance between preservation and recreation opportunities is a challenging task that managers at Golden Gate National Recreation Area are committed to reaching.

Document Change

Zone Descriptions: Remove the word “aggressively” from both natural and sensitive resource zones. Keep the term “may involve controlled access” but add text clarifying that controlled access could involve fencing out highly sensitive areas.

Vol 1, abstract change text:

Established in 1972, Gold Gate National Recreation Area has been operating under its first general management plan, approved in 1980. Muir Woods was declared a national monument in 1908 and is currently managed as part of Golden Gate National Recreation Area. Just as the boundary of Golden Gate NRA has changed over time, the laws and mandates under which the National Park Service is directed to operate have also changed.

The primary directives of the National Park Service is the NPS Organic Act of 1916 and the NPS General Authorities Act of 1970 which was crafted and later amended and enacted into law in 1978. Of the 1978 amendments, the Redwood amendment in particular mandates how the preservation of resources should be approached within the national park system. Within the NPS General Authorities Amendment of 1978, the National Park Service’s obligation to conserve and provide for enjoyment of park resources and values was further explained. In this legislation, Congress clarified that that National Park Service must ensure that resources at all National Park Units, whether they are national parks, national monuments or national recreation areas, remain unimpaired and without derogation. Resources must be protected in line with the park’s purpose. 2006 NPS Management Policies direct that park managers may allow impacts to resources only if legally allowed and direct to do so: “...the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides

otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service" (1.4.4). These Management Policies continue to explain that protecting park resources enables the larger purpose of the park service to be obtained: "It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them" (1.4.4)

Primary responsibility of the National Park Service is interpreted by Congress as ensuring that park resources and values are unimpaired. Since the park's establishment, it has doubled in size and a better understanding of the park's natural and cultural resources and recreational uses has been gained. A new management plan is need to guide these two parks for the next 20 years. The *Draft General Management Plan / Environmental Impact Statement* describes three action alternatives for managing Golden Gate National Recreation Area and Muir Woods National Monument.

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Importance of Education

Concerns

36602: One commenter felt that sensitive zones could be mapped and that outreach could be used instead of enforcement.

Response

The importance of education on sensitive resources is included throughout the document, particularly in the user capacity section (Volume III) which outlines how visitor use will be managed to protect resources. Enforcement is also an important tool for managing the park's resources, particularly as it relates to highly sensitive and vulnerable assets. Both tools are important to the NPS management toolbox to achieve desired conditions and fulfill policy requirements. To emphasize the important role of education in managing park resources, the following goal statement has been added to the list of natural resource goals: "increase visitor understanding, awareness and support for park resources

through education and interpretive opportunities that include messages on the sensitivity of park resources, park regulations, and appropriate visitor behaviors."

Document Change

Alternative Concept Description: add the following goal statement to the list of natural resource goals: "increase visitor understanding, awareness and support for park resources through education and interpretive opportunities that include messages on the sensitivity of park resources, park regulations, and appropriate visitor behaviors."

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Regulation of Access

Concerns

36593: The San Francisco Dog Owners Group expressed concern that regulating access to the GGNRA would result in increased visitation to city parks, which do not have the funding to accommodate increased use, and is in opposition to the GGNRA's Enabling Legislation.

36596: One commenter stated that the Draft GMP does not address the impacts of restricting access/activities of current uses on the surrounding jurisdictions and the people that use these parks on a daily basis.

Response

Management tools to regulate the volume of access to park lands (e.g., permits, reservations) would be used sparingly, in a limited number of high use areas, and mostly at peak times. It is expected that these actions may disperse some use to other areas of the park and possibly to other times of the day or year. It may also result in a small number of visitors seeking out other park locations such as state and local parks. Most current activities will continue as part of the preferred alternative, with the addition

of new opportunities and services which may draw visitors from other park lands into the national recreation area.

Document Changes

Cumulative Impact Section: Additional language should be added to the cumulative impact section for visitor use and experience to acknowledge both beneficial and adverse impacts on local jurisdictions from the GMP.

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Economic Value

Concerns

36592: Commenters, including the San Francisco Dog Owners Group, questioned where the analysis of social and economic values was included and also requested that this discussion be moved to the summary and introduction sections of the Draft GMP.

Response

Consider bringing the cumulative impact section (for all topics) from Volume III into Chapter 4 of Volume II to maintain continuity of topic presentation. In addition, consider integrating an overview paragraph on the social and economic value of the park in the introduction.

Document Changes

Chapter 4, Volume II: Consider bringing the cumulative impact section (for all topics) from Volume III into Chapter 4 of Volume II to maintain continuity of topic presentation.

Volume I, page 3: integrating an overview paragraph on the social and economic value of the park in the introduction (Volume I, page 3).

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Safety

Concerns

36591: The San Francisco Dog Owners Group stated that the analysis of public safety in the San Francisco park units is not adequately addressed in the Draft GMP. They suggested that a reduction in use of these park units could result in an increase in crime.

Response

Park use is not expected to decrease as a result of the plan, so there would be no measurable effect on safety. In addition, visitor safety has been analyzed as part of the visitor use and experience potential consequences section (see Volume II).

Document Changes

None

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Changes in Visitation

Concerns

????:

Response

Over the last 30 to 40 years, the dynamics of how many people visit Golden Gate National Recreation Area, and the activities they participate in while there have drastically changed. As stated in Volume II, Visitor Use and Experience section, when Golden Gate National Recreation Area was established in 1972, the park had just over 42,000 visitors. There have been substantial increases, and a few intermittent decreases since then, but annual visitation has remained about 14 million visitors over the last 10 years. As an urban park, the purpose of Golden Gate NRA is closely tied to those 14 million visitors having access to and use of resources within its boundary. Simultaneously, the park service is mandated to ensure that those resources, both natural and cultural, remain unimpaired. As visitation dynamics change, the National Park Service must balance regulating large use levels and a wide variety of activities with the protection resources. Mandates related to public enjoyment have to be balanced with those relating to resource protection so that recreational uses can continue for both current and future visitors.

Document Changes

None

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Visitor Surveys

Concerns

Comment [MSM1]: What concern is this addressing?

36543: Commenters suggested that the GGNRA should conduct systematic and routine visitor surveys, including visitor counts, in order to ensure that the recreational value of the GGNRA is not being impeded by NPS management decisions.

Response

Understanding who visits Golden Gate National Recreation and how they experience the park is vital to park management decisions. Park staff collect visitor use statistics on an on-going basis and these data can be accessed by the public at: <http://www.nature.nps.gov/stats/>. In addition, park staff have conducted and will continue to conduct routine visitor surveys throughout the park. A social science strategic plan was recently developed by park staff to guide those research projects. Lastly, continuing to monitor visitor use and related expectations and experiences is included in the user capacity section of the GMP (Volume III).

Document Changes

None

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Clarification of Recreational Uses, Including on New Lands

Concerns

36541: Commenters posed questions regarding the definition of types of activities that are explicitly allowed at the GGNRA under the Draft GMP, such as surfing, family events, running events, compatible recreation, and dog walking. (The former sentence can be responded to by a Recreation master comment; the next should be part of a NEPA master comment.) The Crissy Field Dog Group stated that the Draft GMP be revised to define the range of recreational activities on GGNRA lands, describe the environmental baseline with regard to recreation, and impacts on the recreation baseline of the proposed action alternatives.

36492: One commenter suggested that guided tours should not be excluded from urban recreational areas.

36633: USFWS and the Crissy Field Dog Group provided several suggestions regarding specific improvements and the preferred alternative, such as additional environmental review of the preferred alternative be undertaken when specific projects are planned, and that the Draft GMP should clarify that new lands would be treated the same as any other GGNRA lands and recreational uses will be allowed to continue (except when regulated through site-specific public land planning processes and associated environmental review).

Response

The GMP uses the terms, visitor experience and visitor opportunities to be inclusive of recreation opportunities and activities. Recreational opportunities vary widely, and not all permissible activities are explicitly listed in the GMP. One of the key management goals, Connecting People with the Parks, of this GMP is to engage community members and visitors with park resources. The first management concept "emphasizes the park's management commitment to the founding idea of "parks to the people," and the park's fundamental purpose of bringing national park experiences to a large and diverse urban population. Improving connections between the park and the people is fundamental to achieving the park's purpose and to maintaining the public's continued interest and support" (See Concept 1: Connecting People with the Parks in the Concepts for Future Management section of Volume 1). A wide range of recreational opportunities and experiences in a diversity of settings aims at filling this goal.

Concerning newly acquired lands, the goals for the preferred alternative for San Mateo County (Volume 1, page 216) include focusing on the importance of providing access and engaging the community in the newest park lands...key improvements would include a sustainable system of trails that will connect with local communities and contribute to an exceptional regional trail network." In addition, the need for more directional signs and trailhead parking throughout these areas was also emphasized. These goals would allow for consideration of many of the specific ideas provided by commenters. Detailing specific trails and related parking improvements in all areas of the park is outside the scope of this plan.

As part of NEPA compliance, environmental baselines have been conducted as part of this plan. Environmental baselines specific to recreation is included under the category of "visitor use and experience." Existing uses on newly acquired lands will be evaluated for consistency with NPS regulations and policies. If uses are not consistent, they may necessarily be restricted. Other existing uses will be guided by subsequent planning efforts.

Document Changes

Vol II, 116: Change wording to 'informal sports' in. Consider striking the portion of the statement "such as guided activities."

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Zoning

Concerns

36485: One commenter noted that the Draft GMP only identifies recreation within the "diverse opportunities" zone, and that popular recreation activities would be prohibited in the "natural" zones. One commenter objects to the designation of active recreation areas as "diverse opportunities" zones, and notes that the terminology suggests that visitors may find these zones more attractive.

36488: One commenter stated that many Natural Zones are adjacent to urban areas, and should be removed from Natural Zone designation.

36496: Commenters suggested that the Zone Management definitions do not reflect the Enabling Legislation which addresses urban recreation, and provided language to describe the natural and other management zones.

36532: Commenters suggested that the trees at the Octagon House be removed and open it up to visitors, install and upgrade bathrooms and water fountains at Ocean Beach, Fort Funston, and Stinson Beach, creating additional recreational facilities at Ocean Beach and Fort Funston, repair the crumbling wall at Ocean Beach and avoid adding food services at Fort Funston. Recreation facilities and transportation should be identified as having the highest priority for discretionary funding.

36490: ~~One commenter suggested that two areas under the Natural Zones should be designated (explain where/how?). One commenter suggested Fort Funston should be identified as a Sensitive Resources Zone, and~~ Ocean Beach should be identified as a Diverse Recreational Zone. CLARIFY:
"REDESIGNATED? REZONED? WHICH?"

36494: Commenters stated that the GGNRA is within an urban setting with no backcountry wilderness, and such should not be managed as backcountry areas, and that the only "controlled access" that should occur is through barriers and signs, not permitting. The San Francisco Dog Owners Group stated that these areas currently receive more thousands and thousands of visitors every day. Yet the Draft GMP/EIS proposes to manage two-thirds of Ocean Beach and most of Fort Funston as low-use natural

zones. The GMP needs to better reflect reality and acknowledge that Ocean Beach and Fort Funston are high-use areas and should be managed that way.

36495: Commenters, including the Golden Gate Raptor Observatory, suggested that the Marin Headlands and Fort Funston should be designated and managed as Natural Zones, with emphasis on the protection and restoration of natural habitat. [Commenter: GGRO]

36554: Commenters suggested that recreational opportunities should be expanded, not reduced from Ocean Beach and Fort Funston such as tent camping. Commenters also stated that providing a backcountry experience in San Francisco is not feasible given the urban surroundings of the GGNRA.

Response

Explain the plan zones, clarifying what those zones mean. For instance, clarify that the natural zone is not a pristine area, that it will have some facilities and recreational uses available but that experiences of nature and solitude are uniquely available in this zone even though close to the city. Provide examples of what external threats (not dogs) may be such as activities along the boundary of the park which have impacted resources. Describe the general activities permitted in each zone, clarifying that examples provided in the plan are not exhaustive. Where possible, mention that zoning could allow for dog walking, or that at least does not exclude it.

*see Concern Statement Matrix 36496 for language on natural zone

*See Concern Statement Matrix 36485 for language change in types of activities allowed

Specific Zoning: Fort Funston zoning: Clarify that zoning does allow for resource protection and that if needed, some areas could be closed for this purpose. Address concerns that current zoning does not adequately reflect the high-use levels in this area by again clarifying what zoning means.

Ocean Beach zoning: Need to research the language of the agreement of transfer of land from SF to GGNRA. Explain the context of management has changed as now federally listed species use this area 9 months out of the year and it must be managed accordingly. Justify why this area is considered natural zone, as it accommodates the majority of existing use. Address concerns that current zoning does not adequately reflect the high-use levels in this area by again clarifying what zoning means. Also explain that master plan for Ocean Beach will guide implementation of future facilities and uses.

*See Concern Statement Matrix 36532 for language on Ocean Beach master plan

Respond to idea of Fort Funston and Martin Headlands should be natural zones.

#66 (Cahill): The majority of the Marin Headlands and portion of Ft. Funston are zoned with the natural zone to ensure protection of park resources, including native habitat. Other zones in these areas also will provide resource protection, particularly for sensitive species and habitat. In addition to the zone description, the description of the alternatives for these areas the need to restore and maintain native

habitat, particularly to protect shorebirds, coastal bluffs, and bank swallows and to allow natural coastal and marine processes to occur.

#84 (Cahill): The zoning for Ocean Beach and Ft. Funston in the preferred alternative would maintain existing types of recreation opportunities as well as enhance visitor opportunities through landscape and trail improvements and other visitor amenities (e.g., restrooms, group picnicking). The area of recreation opportunities may vary, however the opportunities themselves will remain

*See Concern Statement Matrix for further language on Fort Funston- 36490

Document Changes

Zone descriptions: add language that "the list of typical activities includes, but is not a full listing of all activities allowed."

Zoning: Strike "family events" in language. What we mean is larger organized events, not just someone's family going for a picnic. How the park manages group sizes is available on the web site. Incorporate some guidance from SPUG/OPEC - events/coordinating group on permits language - or reference the guidance (DSC has a copy)

Natural Zone description: Consider removing the term "backcountry" from the natural zone since the remainder of the zone description adequately conveys the type of visitor opportunity that will be provided (e.g., visitors will have an opportunity to be immersed in a natural environment, experience natural sounds and closeness to nature, and participate in a range of passive recreation opportunities - hiking, walking, sightseeing, wildlife viewing and education).

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Recreation as a Plan Goal

Concerns

36551: One commenter stated that recreation must be a priority for San Francisco, San Mateo, and Marin Counties. Commenter also stated that recreation, the health and well being of people, and the impact on local communities is not a stated goal of alternative 1.

Response

The GMP uses the terms, visitor experience and visitor opportunities to be inclusive of recreation opportunities and activities. The preferred alternative for San Francisco, San Mateo, and Marin Counties is focused on "connecting people with parks," which is inclusive of providing a diverse range of recreation opportunities throughout all three counties. The goals for this alternative include several statements about encouraging recreation, including directing the park to "actively seek opportunities that respond to the needs and interests of a diversity of park visitors;" and "encourage visitors to engage in a wide range of opportunities and experiences in a diversity of settings." (page 20 of the executive summary).

Document Changes

None

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Response Topic 3: “Birds at Alcatraz Island”

Birds at Alcatraz Island

Concerns

36577: Commenters (including Golden Gate Audubon Society - Wild Equity Institute) questioned the analysis of impacts to birds on Alcatraz Island stating that night herons would be disturbed if the ruins

were removed. Other concerns for bird species on Alcatraz included providing more protection for the Western gull and carefully considering the impacts of increased visitation on seabirds.

36487: PRBO Conservation Science stated that the proposed restoration and management of buildings and landscapes in the Historic Immersion Zone (main prison area on Alcatraz Island) and increased access for visitors would negatively impact the habitat of multiple bird populations and colonies.

36506: PRBO Conservation Science stated that, on Alcatraz Island within the Park Operations Zone, the proposed rehabilitation and stabilization activities to the Quartermaster Warehouse and Power Plant would likely have a negative impact on adjacent Western Gull colonies as well as Pigeon Guillemot nesting habitat and that visitor access to the Power Plant should be limited to the months outside of the breeding season.

36507: PRBO Conservation Science suggested that providing overnight accommodations should avoid disruption of seabird nesting and roosting areas through human activity, night-lighting, and noise, and the potential for visitors to access unauthorized areas.

36618: One commenter questioned whether increased visitation is expected for Alcatraz Island under the Draft GMP, while another commenter had concerns that increased visitation would negatively impact seabirds.

36624: PRBO Conservation Science and the Marin Audubon Society suggested that maintenance and construction on Alcatraz should be scheduled to avoid disturbance to birds during nesting season February 1 through July 8.

36583: One commenter (San Francisco Bay Joint Venture) suggested additional management actions to reduce impacts to colonial nest sites on Alcatraz Island, including having maintenance and construction personnel work with biologists to limit disturbance.

36584: Commenters (Marin Audubon and PRBO Conservation Science) stated that the analysis of special-status bird species on Alcatraz Island was inadequate. Specific concerns included no analysis on the long-term adverse impacts to nesting and roosting bird colonies, the negative impacts of increased visitor use, and the negative impacts of introducing food/kitchen services, as well as overnight accommodations.

36578: The Marin Audubon Society questioned the impact analysis for Vegetation and Wildlife Habitat at Muir Woods, stating that the impacts of alternative 3 would be major adverse for natural resources, rather than minor beneficial.

Response

Impact Analysis in FGMP/EIS:

Given the broad scope and large geographic scale of a general management plan, the NPS considers the level of habitat impact analysis in the FGMP/EIS appropriate. This GMP is a long-range, park-wide

document. When specific actions identified in the GMP are implemented throughout the park, the NPS will do further environmental analysis and regulatory compliance at a much more site-specific, detailed level. This is when the level of analysis noted in some public comments will be addressed. The GMP includes an “Implementation Planning and Mitigative Measures” section that outlines this commitment.

Also, the “Potential Environmental Consequences” section for Alternative 3 effects on “Habitat (Vegetation and Wildlife)” has been modified in various areas of the FGMP/EIS to clarify the anticipated impacts to waterbird habitat on Alcatraz Island. Most notably, the edited language draws distinctions between the effects on western gulls and the effects on other waterbird species on Alcatraz Island. Due to the proposed cleaning and/or removal of the ruins near the Parade Ground under the NPS Preferred Alternative (in the Historic Immersion zone), the impact to the western gull species would be long-term, major, adverse, and localized. The Parade Ground is the only area within the Historic Immersion zone that would have notable natural resource impacts. Also, as clarified in the conclusion of the impact analysis for Alternative 3 (in “Habitat (Vegetation and Wildlife)” subsection), the NPS would ensure that impacts to other waterbird species on Alcatraz Island would not exceed a long-term, moderate, adverse, and localized effect due to the implementation of available adaptive management measures to protect bird habitat.

Lastly, for clarification, there are no known state- or federal-listed threatened or endangered bird species on Alcatraz Island. This has also been noted in impact analysis of biological resources for Alternative 3, the NPS Preferred Alternative for Alcatraz Island (see “Potential Environmental Consequences” section).

Mitigating Visitation Impacts to Waterbird Habitat:

The robust nature of the bird colonies on Alcatraz Island has sustained the colonies through many changes in uses and activities on the island since the decommissioning of the prison in the 1960s. Through the use of careful biological monitoring and adaptive management measures, NPS staff is confident that healthy bird colonies can be sustained on the island into the future under the guidance of the NPS Preferred Alternative for this GMP (Alternative 3).

More specifically, although the spatial area of possible visitor access on Alcatraz would increase under the GMP, the volume of visitation on the island would be monitored and managed closely by the NPS. The GMP includes a comprehensive user capacity strategy to manage and/or address visitation volume issues (see “User Capacity” section). This strategy sets forth the process that the NPS will apply to monitor visitation via the use of indicators and standards. For example, one indicator that monitors visitation effects on waterbirds is *“the number of incidents of visitor disturbance to Brandt’s cormorants that result in impacts to individual birds during nesting season”*. In this case, the Brandt’s cormorant would be used as an indicator species/resource that would help staff monitor overall impact to all waterbird species. When conditions of the particular resource indicators exceed the set standards, the NPS would apply the appropriate adaptive management and mitigation measures to protect the resources. For more detail and explanation, please refer to the “User Capacity” section of the document.

Some concerns were raised about the possible increases in visitation in the Park Operations Zone. As noted in the description of the Park Operations Zone for Alternative 3 (NPS Preferred Alternative for Alcatraz Island), visitor access to the Park Operations zone would be extremely limited. **THE ABOVE IS CURRENTLY NOT IN THE ALT. 3 DESCRIPTION OF THE PARK OPERATIONS ZONE (Vol. 1, page 169). CLARIFICATION: DOES GOGA STAFF WANT THE DOCUMENT TEXT TO BE EDITED TO CLEARLY STATE THIS?** Also noted in the Alternative 3 description for Alcatraz Island, access to the yard (including the proposed rehabilitation and stabilization work on the Quartermaster Warehouse and Power Plant) "would employ measures to protect nearby seabird habitat".

In addition, the overnight accommodations on Alcatraz would be highly supervised to deter guests from disturbing waterbirds and bird habitat on the island. The description of the Historic Immersion Zone (Arrival Area) for Alternative 3 has been amended to include language to this regard (see "The Alternatives for Alcatraz Island" section). **[YES? DOES PARK STAFF WANT TO MODIFY THE ALTERNATIVE DESCRIPTION TO CLARIFY THIS TO ADDRESS A CONCERN/COMMENT?]**

Lastly, an NPS staff biologist monitors all park activities and visitation on Alcatraz Island on a daily basis and assesses 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.

Mitigating Maintenance and Construction Impacts to Waterbird Habitat:

All NPS maintenance and construction-related activities on Alcatraz Island must adhere to the restrictions and guidelines outlined in the Alcatraz Island Historic Preservation and Safety Construction Program Final Environmental Impact Statement (AIHPSCP). This document codifies several mitigation measures that limit the timing, duration, and type of disturbances associated with park operation activities. For example, in accordance with the mitigation measures included in the AIHPSCP, construction-related activities cannot occur during the waterbird breeding season on the island.

And, in addition to the park's strict adherence to the AIHPSCP, an NPS staff biologist monitors all park maintenance and construction activities on Alcatraz Island on a daily basis and assesses possible impacts to bird habitat. The island biologist is consulted regularly for input on ways to avoid and/or mitigate maintenance and construction impacts to birds and bird habitat on the island.

Document Changes

Environmental Consequences: add caveat "except for Alcatraz Island..." under 'Moderate.' Also add in same paragraph, add "population viability would be maintained?"

Environmental Consequences Section: near end of section add "possible major impacts to gulls." In same section say that we would adaptively manage to avoid major adverse impacts add "with the exception for gulls." *note, check for ripple effects of those decisions in other alternatives (1).

Document wide: replace "rubble piles" with "ruins"

Environmental Consequences: replace "substantial" adverse effects with "major adverse impacts"

Alt 3 Impacts to Habitat: Ensure all changes to Alt. 3 impacts to habitat are consistent in both the Analysis paragraphs and in the Conclusion.

Environmental Consequences Section: Add statement to Enviro. Conseq. Section for Alt. 3 (biological resources) that no known state- or federal-listed threatened or endangered bird species inhabit Alcatraz Island.

Alt 3 Park Operations Zone: Edit the alternative description of the Park Operations Zone for Alternative 3, stating that “visitor access to the Park Operations zone would be extremely limited”.

Alt 3 Historic Immersion Zone: Edit the alternative description of the Historic Immersion Zone (Arrival Area) for Alternative 3 to state that “the overnight accommodations on Alcatraz would be highly supervised to deter guests from disturbing waterbirds and bird habitat on the island”. [CONFIRMED?]

***NOTE**: Based on an NPS EQD non-impairment guidance memo dated October 31, 2011, the GOGA FGMP/EIS must address the new non-impairment determination guidance (as outlined in memo), not the previous guidance. This means that all non-impairment determinations in the Enviro. Consequences section must be removed. Instead, a non-impairment document would be appended to the R.O.D. The FGMP/EIS would only include a short discussion of this forthcoming determination in the Laws and Policies section of Ch. 1.

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Response Topic 4: “Dog Walking”

Dog Walking, Topic Response

Concerns

????:

Response

The NPS received many public comments on the GMP addressing dogwalking within GGNRA. Due to the controversy and litigation surrounding dogwalking, the need to address dog management coming a number of years prior to the start of the GMP, and the site specific details needed to adequately describe the implementation of a dogwalking plan at twenty-two distinct areas, GGNRA initiated a planning effort focusing solely on dog management, separate and distinct from the GMP. Because the GMP covers many of the same geographic areas as the dog management plan, and thus has considered many if not all of the same resources and values present at those locations, its proposed zoning is broadly consistent with the dog management plan. However, the GMP and dog management plan are separate and distinct planning documents; if there are inconsistencies, the final dog management plan would amend the GMP for this particular use. GGNRA encourages those individuals who have submitted comments to the GMP regarding dogwalking and associated environmental consequences to re-submit those comments, if applicable and not already submitted to the draft Dog Plan/EIS, to the supplemental dog management plan/EIS anticipated for public review and comment in late summer 2012.

Document Changes

None

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NEPA Analysis

Concerns

36606: The Crissy Field Dog Group stated that the Draft GMP does not comply with NEPA for several reasons, including the need for an analysis of recreation (review letter to clarify their concern), as well as a failure to analyze the impacts to the human environment from limiting access. Further, they state that the Draft GMP pre-determines the outcome of other ongoing planning documents (the Dog

Management Plan) and incorrectly excuses the park from further NEPA analysis on future projects. Crissy Field Dog Group States that a separate Land Protection Plan should be prepared.

Response

Decisions about dog walking are not made in the GMP, but instead are made through the Dog Management Plan/EIS, as also described in the GMP, under the section “Planning Issues: Issues that will not be addressed.”

The need to analyze recreation is done through the analysis of the visitor use and experience.

Land protection plan concern – does GGNRA have one for the new lands? Not sure how to address these comments 252532, 252535, 252257, and 252538 (health impacts) by Crissy Dog Group. To do: make sure to address all comments by Crissy Dog Group.

(NOTE: the team discussed including references to dog walking in the zoning descriptions, but rejected that idea because it would be redundant with volume I, page 34 text. The decision to not mention dog walking in this plan was an attempt to leave that decision completely to the dog plan)

Note: need to discuss land protection plan, analysis of human health impacts, probably read the Crissy Dog Group letter as a whole to ensure we have responded to all their comments.

Document Changes

Volume I, page 34: Reword last sentence because the FGMP will likely be published before the Final Dog Plan. Last sentence should read “However, if there are inconsistencies, the final dog management plan would amend the GMP for this particular use.”

Sensitive Resource Zone: To do: Need to make changes to the Sensitive Resources Zone to make it more protective (Daphne)

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Response Topic 5: Sensitive Resources Zone “Boating and the Sensitive Resource Zone”

Kayak Recreational Use

Concerns

36540: One commenter from the Bay Area Sea Kayakers made several suggestions regarding recreational opportunities at the GGNRA, such as: keeping coastal access open to small, non-motorized water craft.

36553: Commenters suggested that kayakers and other non-motorized vessels should be granted access inside the proposed Sensitive Resources Zone in Marin County (especially at Point Bonita Cove and Bird Rock), citing visitor experience and safety concerns.

36497: Commenters objected to the designation of the offshore areas at Point Bonita Cove and Bird Rock as Sensitive Resources Zones, stating that these areas are needed for the kayaking community, and for the safety of the kayakers in the area. The Bay Area Sea Kayakers suggested that more specific information should be provided regarding the management zones at Bird Rock and Bonita Cove including access and restrictions. Other commenters suggested that more emphasis should be given to educating kayakers and boaters on the potential to disturb marine birds, and that there should be more signs informing people of the ecological values at the Marin County sites.

Response

The Sensitive Resource Zone around Bonita Cove and Bird Island has been changed in the Preferred Alternative to extend 300 ft. out from the shoreline, rather than to the park boundary at ¼ mile. The Sensitive Resource Zone description related to Visitor Experience has been clarified and further limits visitor activities that would be allowed within this zone, to better meet the intention of this zoning designation. In general, boating and visitor access would be restricted or prohibited, particularly during the most sensitive times of the year. Zoning restrictions would not apply during actual emergency situations.

Document Changes

Alt 3, Preferred Alt Map: Sensitive Resource Zone in Marin County at Bonita Cove and Bird Island needs to be changed to 300 ft.

Sensitive Resource Zone Description: •Sensitive Resource Zone description for Visitor Experience needs to be re-written to further restrict public access in this zone.

Volume 1, page 209: The preferred alt text on V.1 p. 209 is fine, as is the summary of alts Table 17. All other text looks ok.

Note: Discuss visitor use in sensitive resource zone.

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Response Topic 6: Equestrian

Equestrian Uses

Concerns

36512: Commenters suggested that less emphasis should be placed on equestrian endeavors and that horses should not be allowed on clay paths.

36513: One commenter stated they would prefer to see 2 horse safe bridge crossings over Redwood Creek crossings where the bends in the creek can cause bank erosion during heavy rains.

36514: Commenters suggested that it is important to maintain the Presidio Stables in the Marin Headlands for recreational and historical preservation reasons.

36516: Commenters stated support for retaining the Mounted Patrol at its current location at Tennessee Valley. (Note, concern statement has been redrafted, removing the non-substantive portion of the comment)

36550: One commenter stated that the format of the Draft GMP should be consistent in order for the public to better understand how the alternatives affect the lower Tennessee Valley and mounted patrol.

NOTE: Commenter took exception with "ambiguous summary" on page 280 and with inconsistency in headings.

Response

#38 (Aviles/Lucas): The NPS recognizes that horseback riding is a popular means of recreation and that it expands the variety of visitor experiences available in the GGNRA. The equestrian-related improvements proposed in the DGMP preferred alternative are intended to address important resource management goals and balance this activity among other kinds of recreational activities, including walking, and bicycling.

GGNRA acknowledges that soil erosion on trails is an important aspect of resource management and could consider wet weather closures or other use restrictions for trails on erosive or unstable soils, including clay soils, in future planning.

#71 (Aviles/Lucas): The creek crossings a commenter mentions are in Mount Tamalpais State Park, and not within the scope of the GMP; however, the GMP expresses the NPS intention to cooperate on restoration, stewardship, and recreation in the Redwood Creek watershed in the overview of the Muir Woods preferred alternative. The comment will be shared with State Parks in the interest of advancing protection of creek resources and providing safe trail connections in the watershed.

#72 (Aviles/Lucas): The DGMP preferred alternative proposes to retain equestrian uses at Rodeo Valley, as recommended by the commenter. The Marin Equestrian Plan EA, now under development, will determine other parameters for equestrian activities in the facility presently known as Presidio Stables.

#73 (Aviles/Lucas): The park mounted patrol, and all other programs, facilities, and structures would be removed to enable restoration of the riparian area, which would greatly enhance ecological values and is a high priority for the NPS in this area. The Marin Equestrian Stables Plan EA will determine the new location for the park mounted patrol.

Note (Bodo): Consider noting the potential park horse patrol location change from the lower valley to the diverse opportunities zone in the summary table on page 280.

Document Changes

None

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Mounted Patrols

Concerns

36516: Commenters stated support for retaining the Mounted Patrol at its current location at Tennessee Valley, ~~and also request to keep the horses visible at the Golden Gate Dairy.~~ NOTE: Strikeout on non-substantive portion of comment..

Response

The intent of the text in the Draft GMP was to indicate that the Mounted Patrol would remain in its current location. This text states:

Tennessee Valley (from Oakwood Valley to the ocean)

A major trailhead, multiple trails, Haypress Meadow hike-in campground, and an equestrian center are in the upper end of the valley. A site in the lower valley contains a nursery operation, the park's small horse patrol, an environmental education program, and the Youth Conservation Corps seasonal group campsite. This area would continue to be managed in a way that accommodates these intense and varied visitor uses. The management of equestrian facilities in this area would reflect the equestrian management environmental assessment that is underway.

Document Changes

Vol. 1, Part 5, page 189: The text will be revised so that it is clear that the Mounted Patrol will remain at its current location at Tennessee Valley, and that the horses will be kept visible at Golden Gate Dairy.

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Response Topic 7: Maintain Facilities

Maintaining and Repairing Facilities

Concerns

36525: Commenters stated that a top priority for the GGNRA should be to repair and maintain neglected facilities. Others stated that new building construction should follow the profile of the landscape, and that the GGNRA should remove existing visitor facilities and discontinue recreational uses where continued use is unsafe, infeasible, or undesirable due to changing environmental conditions.

36482: One commenter stated that high visitation areas like Fort Funston and Ocean Beach have almost no facilities (such as bathrooms and water fountains), and Stinson Beach facilities are in need of urgent repair. Additionally, paved walking paths are crumbling and eroding at Fort Funston and at parking areas along the Great Highway at Ocean Beach

36611: Commenters suggested priority funding for paving and/or restoring the walking paths at Fort Funston, specifically the Sunset Trail which provided access for the disabled.

Response

Maintenance is an ongoing need for park facilities. The GMP includes information regarding large scale facility rehabilitation and historic preservation projects, but does not include details about year-to-year maintenance priorities. Projected schedules for maintaining facilities are captured in the Park Asset Management Plan (PAMP), which uses a number of Park Service-wide criteria to identify maintenance priorities.

NPS Management Policies 2006 on park facilities and design principles would guide building design. Management Policies require that designs for facilities are “harmonious with and integrated into the park environment.”

The park contains a large number of facilities, not all which support the park’s mission. The GMP planning team examined those facilities, and considered them for disposal. The goals and strategies may be found in the GMP section titled Facilities Not Directly Related to the Park Mission.

The preferred alternative includes very few new facilities. The vast majority of recommendations are for historic preservation and facility rehabilitation. The cost estimates for new facilities are far outweighed by estimates for historic preservation and facility rehabilitation.

One of goals of alternative 1 is to enhance access to and within park lands and make them welcoming places to visit, which is consistent with providing visitor amenities. At Ocean Beach and Fort Funston, the preferred alternative calls for improved visitor amenities, including parking, restrooms, trails, and other items. The preferred alternative recommends replacement of Stinson Beach facilities with sustainable new facilities which would replace deteriorated restrooms, showers, picnic areas, and parking lots. Descriptions may be found in the alternatives section of the GMP. Trail improvements at Fort Funston are part of the preferred alternative and could include the Sunset Trail.

Management Policies 2006 guides where and if facilities would be rebuilt if destroyed due to natural hazards, and the policy states that new or rebuilt facilities should not be located in areas where they would be damaged or destroyed by natural physical processes. A sentence was added to the plan to acknowledge this. (NOTE: Include this last sentence only if we did make this change.)

Notes: 1) Ask Daphne about NOAA edit 2) Ask Brian about facilities at Ft Funston and Ocean Beach (drinking and restroom) 3) Editing – do we use “preferred alt” in final? Or “the plan proposes” 4) “could” or “would” include the Sunset Trail?

Document Changes

Volume I, page 120: Do we want to make this suggestion by NOAA? Vol I, page 120, add this sentence after 1st sentence in first bullet: “Do not allow for new construction in areas that are subject to changing environmental conditions.”

Volume I, page 214: Consider text change: page 214 vol I to include naming the Sunset Trail and describing connecting it to regional trails (Lake Merced, etc) (Nancy may have written text)

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Response Topic 8: Transportation

Improvements to Transportation Network

Concerns

36558: Commenters made suggestions on how the GGNRA would improve the transportation network throughout the GGNRA, such as: maintain better signage along the roads in order to direct visitors to the park and parking areas, include electric buses into the GGNRA's fleet, continuing the trail to meet Redwood Creek trail, improving traffic along Highway 1, and upgrading making parking areas state-of-the-art.

36559: The California Department of Transportation suggested developing a Long Range Transportation Plan for the GGNRA to determine sustainable, multi-modal access to GGNRA sites that would improve transit opportunities. They questioned inter-agency coordination for appropriate decision making responses to emergencies under alternative 2, collaboration in drafting the long-term transportation plan, and suggested reducing overall vehicle miles travelled through the implementation of non-single occupancy vehicle modes of transport used to access the GGNRA.

Response

Specific improvements to facilities to improve non-motorized access such as bike racks and signage are not addressed in a GMP, but will be in follow-on plan implementation actions. GGNRA is currently preparing the park's first Long Range Transportation Plan (LRTP). The plan will provide a vision and planning approach to improving multi-modal access to park sites. It will be consistent with current guidelines on the development of transportation plans prepared by state the Department of Transportation (DOT), and the Metropolitan Planning Organizations (MPO). The plan is scheduled for completion in 2013 following completion of a public outreach process and a draft plan. Alternative 2 is not the Draft GPM preferred alternative. The provision in Alternative 2 that considered abandoning Highway 1 in the event of a landslide was considered, but rejected.

Note: Two concern statements were lumped with one response due to repeat response language

Document Changes

None

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Bicycle and Multi-Modal Access in Marin County

Concerns

36566: The Marin County Bicycle Coalition suggested several ways in which bicycle and multi-modal access to sites within Marin County could improve. Suggestions included separating bicycle and vehicular traffic on Conzelman, Bunker, and McCullough Roads; repair and reopen damaged road segments (with consideration to all user types); provide multi-modal access to all GGNRA sites; providing bicycle parking/racks; improving bicycle access and infrastructure to the Homestead Hill area; coordinating with the California Department of Transportation to ensure the provision of safe and sustainable multi-modal transportation facilities along State Route 1 and the Panoramic Highway.

Response

GGNRA is actively working to improve multi-modal, including bicycle access, to park sites. A more comprehensive transportation planning effort to identify this access is being considered in the LRTP. GGNRA is committed to improving access for non-motorized access as an important part of reducing vehicle trips, reducing congestion, while minimizing impacts to park resources. In improving this access, however, the park is also committed to balancing the need for access with the protection of park resources, which can be impacted by construction of new facilities and/or widening existing facilities. Specific improvements to facilities to improve non-motorized access such as bike racks and signage are not addressed in a GMP, but will be in follow-on plan implementation actions.

Document Changes

Volume I, page 142: Add the following language, following the last bullet: [bullet point] Improve Non-Motorized Transportation Access. [Subsequent Text] Implement actions that will provide improved non-motorized transportation access to and within park sites. The implementation of these actions will lead to a more seamless network of separated and on-road bicycle and pedestrian facilities meant to reduce vehicle trips, reduce traffic congestion, and improve safe transportation options while protecting park resources. Management tools include road and intersection designs that improve access and safety while minimizing increased speeds and impacts to park resources, completing a system of multi-use trails and paths, improved wayfinding and signs, and implementation of traffic-calming measures, among others.

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Congestion Management Tools

Concerns

36568: Marin County Department of Public Works suggested defining the "congestion management tools" that are to be used to manage parking and reduce traffic in Stinson Beach, and to elaborate on types of congestion management efforts that would be used.

Response

Examples of some of the broad range of tools to reduce congestion and manage transportation demand are identified in Volume I, Employ Tools for Congestion Management. Please refer to this section for further details.

Document Changes

None

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NA		

Route 1 and the Panoramic Highway Improvements

Concerns

36570: The Environmental Action Committee of West Marin suggested that the Draft GMP should specify where and how Route 1 and Panoramic Highway (in Alternatives 1 and 2) would be improved and how the improvements would retain scenic rural character.

Response

GGNRA is committed to improving access for non-motorized access as an important part of reducing vehicle trips, reducing congestion, while minimizing impacts to park resources. In improving this access,

however, the park is also committed to balancing the need for access with the protection of park resources, which can be impacted by construction of new facilities and/or widening existing facilities.

Document Changes

None

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Transportation Opportunities at Fort Funston

Concerns

36571: One commenter suggested that light rail transportation could be used at Fort Funston.

Response

Improving public transit access to parklands is an important goal for that park, however, the park is unaware of any plans to extend the local and regional light rail lines to Fort Funston. Any proposal for such a service would need to be evaluated and balanced with the need to protect park resources.

Document Changes

None

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Partnerships to Improve Trails

Concerns

36572: San Mateo County Department of Public Works stated an interest in working with the GGNRA to fund and perform improvements to Richards Road, which serves the Phleger Estate and Huddart County Park.

Response

Richards Road links to the Miramontes Trail at the east end of the Phleger Estate and the Lonely Trail in the southwest corner of the property. GGNRA is interested in meeting with San Mateo County DPW to discuss the desired improvements and provide assistance to facilitate the project where appropriate.

Document Changes

None

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NA		

Transportation on Sweeney Ridge

Concerns

36574: Commenters suggested restricting cars on Sweeney Ridge, and to provide more parking at Milagra.

Response

Currently visitors can access Sweeney Ridge via three primary trailheads: Skyline College (hiking only), Shelldance Nursery (hiking, bicycling and equestrian) and Sneath Lane (hiking and bicycling). Additional access to Sweeney Ridge is permitted through adjacent lands, specifically from Fassler Avenue through Cattle Hill and from the Portola Gate through the Peninsula Watershed (requires permission and gate access). No vehicles are permitted on Sweeney Ridge with the exception of NPS personnel and authorization from NPS for specific uses. Access to Milagra Ridge is somewhat limited due to surrounding private land and adjacent neighborhoods. However, NPS recognizes that additional dedicated parking at Milagra Ridge would provide visitor access while minimizing the impact on the surrounding neighborhood. Construction documents are currently being prepared to install additional parking stalls near the trailhead off of College Drive, including an accessible parking space.

Document Changes

None

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NA		

Improvements at the Montara Lighthouse

Concerns

36616: San Mateo County Department of Public Works stated that CA Coastal Trail improvements and a safe crossing of Highway 1 should be anticipated at the Montara Lighthouse location.

Response

NPS has been participating as a stakeholder in the Highway 1 Mobility Study, "Traffic and Trails", currently being prepared for San Mateo County. We are familiar with the recommendations currently proposed for Highway 1, including improved crossings, and encourage the County to continue to evaluate the consultant's recommendations and prioritize safety throughout the corridor.

Document Changes

None

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Transportation in Muir Woods

Concerns

36607: Commenters suggested increasing year-round shuttle usage in Muir Woods, installing a changeable message sign on Shoreline Highway, exploring possible areas for parking and using the shuttle between the entrance of Muir Wood National Monument and the Manzanita Parking lot, defining how intelligent transportation systems would be employed, installing additional road signage, completing parking and traffic studies for the new welcome center.

Response

There is a comprehensive and planning process currently underway that is evaluating approaches to reduce congestion and improve access to and in the entry area of Muir Woods. It is a stated goal of the planning process for any alternatives to reduce vehicle trips, improve visitor access, and protect park resources.

Document Changes

None

Concern Response Review Status		
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Status of Changes	Changes Made By	Date
NA		

Review of County Maintained Roads

Concerns

36608: Marin County Department of Public Works stated that any configuration of Muir Woods Road or any other County maintained roads should be reviewed and approved by County of Marin, Department of Public Works staff.

Response

This comment has been noted.

Document Changes

None

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Transportation Improvements

Concerns

36564: Commenters suggested increasing parking areas in Marin County, improving pedestrian safety, realigning Muir Woods Road, including trailer parking for the Frank's Valley Horse Camp, separate pedestrian and bicycle accommodation on each side of the road the entire route to West California

(??), adding signs to inform visitors if parking lots are full, promote the use of the Marin Stagecoach, using speed bumps to control traffic speed, conducting a study on visitor access in Tennessee Valley, and work with Caltrans and other organizations to conduct transportation studies to improve congestion. Other suggestions included create wetlands in the south parking, remove portables, return south picnic area to parking, and adding signs at highway 101 for parking and traffic.

Response

There is a comprehensive and planning process currently underway that is evaluating approaches to reduce congestion and improve access to and in the entry area of Muir Woods. It is a stated goal of the planning process for any alternatives to reduce vehicle trips, improve visitor access, and protect park resources. The final deliverables for the process will include a plan for improving access for transit and tour operators, capital improvements needed to facilitate these improvements, and implementation of intelligent transportation systems, and transportation demand management strategies.

In addition, GGNRA is currently preparing the park's first Long Range Transportation Plan (LRTP). The plan will provide a vision and planning approach to improving multi-modal access to park sites. It will be consistent with current guidelines on the development of transportation plans prepared by state Department's of Transportation (DOT), and Metropolitan Planning Organizations (MPO). The plan is scheduled for completion in 2013 following completion of a public outreach process and a draft plan.

Document Changes

None

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Response Topic 9: Costs "San Mateo County"

Equestrian Center Funding

Concerns

36517: Commenters questioned the \$3 million of priority funds to be set aside for the equestrian center at Rancho Corral de Tierra, suggesting that it seems narrow in focus. **CLARIFICATION:** There were two commenters and one of them was a representative from the County of San Mateo Division of Public Works. Commenters questioned why so little capital was set aside for parklands in San Mateo (\$4.6 M of priority funds according to the cost estimates), and why \$3 M of that \$4.6 M was set aside for the proposed equestrian center at Rancho Corral de Tierra. Commenters suggested that other locations and needs were more significant and pressing (Phleger Estate, other possibilities in Pacifica, and improving connections between parklands in San Mateo County).

36524: Commenters expressed concern that not enough funds are allocated for projects in San Mateo County, with the San Mateo County Historical Association stating that the money allocated for the equestrian center at Ranch Corral de Tierra was not justified. **NOTE:** Please see 36517, which is practically the exact same concern.

Response

The park lands in San Mateo County are important and large parts of the park, and it is understandable to question why a smaller portion of the project cost estimates are planned for this geographic area. The primary reason is that throughout the park lands, the GMP focuses effort on addressing historic preservation, facility rehabilitation, and natural resource restoration needed within the park, with very little new construction. Historic preservation costs at Alcatraz Island and in Marin County park lands are particularly high because of the number and size of historic structures at these locations.

The equestrian programs at Rancho Corral de Tierra provide excellent opportunities for many visitors to enjoy park lands, and therefore, we believe expenditures are justified in this area. At Phleger Estate, improvements are planned for trails and trail connections to adjacent public lands.

Document Changes

Description: Consider changing the description or words used for essential/priority costs and desirable/lower priority costs

Note: Question for Brian and Nancy to resolve: Revisit how we characterize essential/priority capital costs vs. desirable/lower priority in the document. Do we want to change the wording? "Essential" does not seem to describe the intent.

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Cost Estimates at Tennessee Valley

Concerns

XXXX (row 65): One commenter expressed concern that the cost estimates at Tennessee Valley do not account for the removal of structures and are therefore not accurate.

Response

The cost estimates for removal of facilities in Lower Tennessee Valley were grouped with costs for natural resource restoration for Marin County park lands; however this has been changed to clarify that the estimated costs of facility removal at Tennessee Valley were included in the GMP. A row was added to the cost estimate tables for alternatives 1 and 2 in facility removal.

Document Changes

Volume I, page 226 : Add underlined text to cost table row on vol. I, page 226 "Marin County sites, including Stinson Beach, Tennessee Valley", change cost to \$1,710,000

TBD, page 227: Add row above "Capehart housing: remove..." Add this: "Lower Tennessee Valley: remove roads and nonhistoric structures", add in cost column: \$250,000

Alternative 2, page 248: NR Restoration, Marin County Sites, cost should be : \$13,400,000. Facility Removal, Facilities at various park sites, costs should be: \$2,580,000

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Response Topic 10: Trails

Interpretive Trails in Muir Woods NM

Concerns

36552: The Marin Audubon Society suggested that visitors could be better informed about important historic events that occurred at Muir Woods National Monument. (NOTE: This is the only substantive comment related to proposal IN Muir Woods. The remainder are about transportation.)

Response

Re-examine the concern statement. Audubon is concerned that by establishing thematic trails the NPS is going too far to interpret historical events.

The proposal to interpret various themes on trails should be viewed in the context of existing and proposed high levels of resource protection for the redwood forest ecosystem. The park carefully manages trail maintenance to avoid impacting sensitive species. No new trail construction is planned within the Sensitive Resource zone which includes the forested hillsides. Only limited modification to existing trails is envisioned here and in the Interpretive Corridor zone where the main trail is located.

New trail construction would only be pursued in the Diverse Opportunities and Natural zones.

Detailed planning to define the specific actions to be taken within the trail corridor, including the appropriate level of interpretive signs and other elements, will be guided by the zone descriptions. In addition, the park closes at dusk, and off-trail travel is prohibited in the park.

Document Changes

None

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Collaborative Trails Maintenance

Concerns

36484: The Presidio Trust suggested that language from the Golden Gate National Parks Conservancy website be used to clarify that the Trust is in collaboration with the NPS regarding trail improvements and the Trails Forever Program, not the Presidio park site (page 160 of the Draft GMP).

Response

The text in the GMP will be revised to clarify this collaboration. The sentence will be revised to read:
Coastal Trail and Bay Trail improvements are planned as part of the Trails Forever Program, a collaborative effort sponsored by the Parks Conservancy, the National Park Service, and the Presidio Trust.

Document Changes

Volume II, part 1, page 160: Revise sentence to read as above.

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Response Topic 11: Sanchez Adobe “San Mateo County”

Historic Resources for San Mateo County

Concerns

36463: San Mateo County Department of Public Works noted that Sanchez Adobe is an historic property that is owned and managed by the San Mateo County Parks Division and jointly managed and interpreted with the San Mateo County Historical Association, and that there have been discussions between GGNRA, San Mateo County Parks, and the Historic Association about a potential joint partnership, which is not addressed in the Draft GMP. Other commenters, including the San Mateo County Historical Association and the San Mateo County/Silicon Valley Convention and Visitors Bureau, stated that no historical resources were mentioned in the GMP for San Mateo County including reference to the Sanchez Adobe Master Plan, while another commenter requested that the San Mateo County Historic Resource Study be listed in the GMP references.

36522: Commenters, including San Mateo County/Silicon Valley Convention and Visitors Bureau, suggested that the San Francisco Bay Discovery Site needs better attention for promotional and educational reasons.

Response

During the final stages of the Draft GMP the Historic Resources Study (HRS) for Golden Gate National Recreation Area in San Mateo County was not completed. However, the draft HRS was used all along in the development of the GMP. In particular the identification of resources and their significance was used in the development of the management zones and the creation of the alternatives. But since the HRS was written concurrently with the development of the GMP, there was not a final version to cite in the GMP text. The HRS helped identify historic properties that are listed in the effected environment section, and the Area of Potential Effect in the GMP.

We have added language to the GMP indicating that the Sanchez Adobe is an excellent location from which to explore partnerships in preservation and interpretation to enhance our connection to the Pacifica communities and to recognize the importance of the Portola Expedition. This language roughly parallels to what is stated for the Woodside Store which we understand has limited parking.

In regards to the Portola Expedition, the GMP will also reference the upcoming 250th anniversary of the Discovery of San Francisco Bay and suggest promoting preservation and partnership-based programs for the Discovery Site on Sweeney Ridge to be developed between now and the anniversary date.

We will add the Historic Resource Study to the GMP bibliography and mention the San Mateo County Historical society under agencies consulted in the preparation of the GMP. We will also strengthen the language in the text about the importance of Portola and its effects on the history of the region included the Native American inhabitants.

The final GMP will include language that the park needs to investigate the location of the Guerrero Adobe and the Pillar Point Whaling Station to determine if they are on, or adjacent to park lands, and determine proper preservation strategies for each site.

Document Changes

Specifics needed

Comment [MSM2]: In response file 'Responses to Comments LB DSC Revised 4-3 and 4-4 docx' this concern statement was listed as 36379, but I believe this is the correct one instead- Can someone verify this?

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Response Topic 12: Presidio Trust “The Presidio of San Francisco”

Presidio Trust (Multiple Concerns)

Concerns

36471: The Presidio Trust commenter stated that the Presidio Trust Management Plan supersedes the Presidio General Management Plan Amendment as it applies to the area under jurisdiction of the Presidio Trust.

36481: The Presidio Trust suggested that the Draft GMP be updated to include the discussions between the Presidio Land Trust and the NPS regarding identifying another location for a centralized maintenance facility at a location outside of the cavalry stables.

36473: The Presidio Trust noted that references to resources within the Presidio of San Francisco should be limited or qualified based on expected impacts within the planning area. As written, the document could give the reader a false impression that the Presidio is actually within the planning area.

36474: The Presidio Trust stated that the rare plants found at the Presidio are not within the GMP planning area and, therefore, not part of the affected environment and would not be affected by implementation of any alternative, and as such should not be included in the Draft GMP.

36475: The Presidio Trust noted that they should be acknowledged within the Draft GMP for funding volunteer opportunities within the GGNRA, including trail building, habitat restoration and conservation, and organized youth programs in the NRA and requested the Trust's involvement be acknowledged.

36477: One commenter stated that the Draft GMP does not highlight the sharp decline in visitation at Ocean Beach and how the NPS will address the recreational value of this impediment to this and future generations. The Presidio Trust stated that the visitation numbers in the Draft GMP are inflated and misleading, stating that the visitors to the Presidio and other public lands outside the planning area are included in the overall number of visitors to the GGNRA.

36478: The Presidio Trust stated that the discussion on watersheds is limited to the Presidio, which is not part of the affected environment and should be omitted. In addition, the discussion incorrectly implies that the Presidio East watershed is managed by the NPS.

36479: The Presidio Trust suggested that it should be acknowledged that they funded the water quality monitoring for the Urban Watershed Project in Area B, and that the Urban Watershed Project has since been replaced by Project WISE (Watersheds Inspiring Student Education) through the Golden Gate National Parks Conservancy. The discussion indicates that water quality monitoring has been conducted "through a contract with the Presidio." The Presidio is not a management agency such as the Trust or the NPS, but is a park site. An appropriate reference should be provided.

Response

This and several other comments from the Presidio could be responded to be stating something like:

Specific concerns about the draft GMP/EIS map and text descriptions of the Presidio Trust management policies, the diverse natural and cultural resources managed by the Trust, public programs offered, and the relationship among the Trust, GGNRA, and Golden Gate National Parks Conservancy have been addressed to provide greater clarity and avoid misrepresenting the proposals in the GMP and their potential effects. This additional clarity has not substantially changed the different action alternatives.

Changes have been made to the Elements Common to All Action Alternatives section, subsection: Facilities for Maintenance, Public Safety and Collections Storage. These reflect a recent agreement between the Trust and NPS for centralized maintenance and collections management that differ from the description in the draft.

Document Changes

Page 37, 3rd Para: change to read as follows -- "The general management plan amendment initially guided the Trust's planning and decision making."

Volume 2, page 117: Add "Presidio Trust" "...the NPS, **Presidio Trust**, and Golden Gate National Parks Conservancy team brought..."

Volume 2, page 38: Replace text: "The GGNRA includes lands in San Francisco draining to San Francisco Bay, the Golden Gate Channel, and the Pacific Ocean. Tennessee Hollow, managed by the Presidio Trust, and Lobos Creek, which is in Presidio areas A and B, remain in a relatively..."

Volume 2, page 42: Add "Trust" to "...through a contract with the Presidio **Trust**."

Next page, add bold text: "...by the Urban Watershed Project, **funded by the Presidio Trust**, and by the National Park Service at the Crissy Field Marsh. **The Presidio Trust also regularly tests water quality throughout Trust-managed watersheds.**"

Volume 2, page 118: Check visitor use section, please state whether the visitation numbers include visits to the Presidio

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Management concerning the Presidio Area A

Concerns

36544: The Presidio Trust requested that the Draft GMP delete the statement that states the GMPA remains as the management plan for Presidio Area A.

Response

This change has been made in the appropriate section of the GMP.

Document Changes

Volume I, part 1, page 30: Delete the last sentence in the paragraph "The amendment remains unaltered...."

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Response Topic 13: PUC “Watershed Lands in San Mateo County”

PUC Project Information and Background

Concerns

36604: PUC stated that the Draft GMP is deficient in the description of the alternatives and does not adequately describe the environmental consequences of the actions, as required by NEPA. Additionally, they state that the Draft GMP does not adequately address possible conflicts between the proposed action and the objectives of local land use plans, policies and controls for the area concerned as required by 40 CFR Part 1508.8.

36456: PUC stated that the Draft GMP repeatedly describes the SFPUC's Peninsula Watershed as park lands that would receive park management guidance under the Draft GMP, which conflates the GGNRA's limited responsibility to administer the Scenic Easement and Recreation and Scenic Easements. Further, the figures in the Draft GMP depicting the boundaries of these easements are inaccurate: the Recreation and Scenic Easement does not include the area of the SFPUC's Peninsula Watershed known as Polhemus and the San Mateo Creek area below Crystal Springs Dam.

Response

Many specific comments in the SFPUC letter request more detailed description of specific proposals and analysis of their impacts. The GMP is a broad programmatic document and will rely on more detailed implementation planning to provide the details of interest to SFPUC for specific planning and projects. SFPUC also identified concerns related to uses and plans for NPS lands adjacent to SFPUC-managed lands. In areas of the park adjacent to SFPUC-managed lands, NPS would coordinate with the appropriate City Department to address concerns including compatibility with current planning.

GMP language related to the SF Peninsula Watershed lands that are within the NPS administered Easements refers to NPS actions as “cooperate with SFPUC” “promote” actions consistent with the Easements and the 2002 Watershed Management Plan. Text describing Alts for SFPUC Peninsula Watershed Easements has been clarified to refer to those documents and to clarify NPS role and acknowledging that these are actions subject to SFPUC Watershed approval or implementation.

Trail concepts within the watershed lands specifically mentioned in the GMP were reviewed with the SFPUC prior to release of the GMP and are generally consistent with the Watershed Management Plan.

Re: Boundary Adjustment, McNee Ranch in San Mateo County: The boundary adjustment described in the DGMP states that this action would be for purposes of correcting a technical error and would facilitate cooperative management. It is not a proposal for acquisition and the specific actions that SFWP&S cites are not GMP proposals. Specific actions that may be proposed in the future would be subject to NEPA and CEQA analysis depending on the nature of the proposed action. Text in the Boundary Adjustments section for McNee Ranch, San Mateo County, has been clarified.

RE: Ocean Beach – not adequate range of alts:

The NPS acknowledges that SFPUC will continue to operate and maintain its critical infrastructure. Text in this section of the document (Alt 1 description for Ocean Beach, both zones paragraph.) has been modified to clarify

Changes

Volume ,1 p 220: text changes in SF PUC Peninsula Watershed Easements section:

(Changes shown here in track changes)

San Francisco Public Utilities Commission Peninsula Watershed

NPS-Administered Easements

Both Zones: all actions described would require cooperation with and approval of SFPUC and consistency with the easements and the SFPUC Peninsula Watershed Management Plan.

Natural Zone (majority of the area, corresponding with the scenic easement) Park managers would continue to cooperate with the San Francisco Public Utilities Commission for the preservation of the natural, cultural, scenic, and recreational features of the watershed consistent with the scenic easement. Within this zone, the park would promote improvements consistent with the SFPUC's 2002 Peninsula Watershed Management Plan including completion of the Bay Area Ridge Trail connection from the Phleger Estate to Highway 92. Consistent with the easement language regarding a trail connection ADD LANGUAGE HERE Park managers would and encourage a new trail connection between the Bay Area Ridge Trail and the California Coastal Trail on the existing management road alignment over Whiting Ridge; this would connect Sweeney Ridge with McNee Ranch and Rancho Corral de Tierra.

Scenic Corridor Zone (eastern area closest to Highway 280, corresponding with the scenic and recreation easement) Park managers would promote preservation of natural, cultural, and scenic values with improved public access on trails consistent with the scenic and recreation easement. Proposed trail improvements include connecting the existing San Andreas multiuse trail to Sweeney Ridge via Sneath Lane, and improving trail access to the Phleger Estate from a new trailhead on Cañada Road. Park managers also would promote the implementation of other trails proposed in the 2002 *San Francisco*

Watershed Management Plan, including completion of the north–south corridor through the watershed in areas of low sensitivity. The park would work with the San Francisco Public Utilities Commission to pursue provide a multiuse trail connection through the Peninsula watershed lands between Cañada Road and Skyline Boulevard north of Phleger Estate. Preservation of scenic views along the trails, Cañada Road, Skyline Boulevard, Interstate 280, and its vista points would also be promoted in cooperation with the San Francisco Public Utilities Commission and Caltrans. The National Park Service would collaborate with the San Francisco Public Utilities Commission in creating a watershed visitor education center ~~near the Pulgas Water Temple on Cañada Road~~, as described in the 2002 *Watershed Management Plan*. Additional coordination with the Juan Bautista De Anza National Historic Trail could also be provided.

Volume 1, p 108 section 3: RE: Boundary Adjustment: Delete “Resource Protection and Trail-based recreation” and replace with “Cooperative management to achieve common goals”

Volume , 1 p 213 – Ocean Beach” In Both Zones...”paragraph: The National Park Service would continue to work with the City of SF, CCC and USACOE to address coastal erosion in a manner that maximizes protection of the beach for its natural and recreational values, relocating park facilities out of vulnerable locations and restoring natural processes.

Editorial Changes:

1. Check rep quotes and letter.
2. Draft response: The description of the alternatives includes reference to the SF Watershed Management Plan and language has been added to the description of Alt 1 (and other Alts?) regarding SFPUC approval of any actions that would be promoted by NPS, and consistency with the Easements and the Watershed Management Plan.

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PUC Easements Information and Display

Concerns

36452: The General Management Plan needs to accurately represent the easement agreements and provide information on those agreements to allow the public and park personnel to reference the agreements. Specifically that the San Francisco Public Utilities Commission (SFPUC) does not provide an easement agreement providing the US government with an easement for a portion of the San Francisco Peninsula watershed land and the map in the Draft GMP should accurately represent the easement agreement and information on all easement agreements. Furthermore, information on the easement agreement with the City of Pacifica should be accurately depicted and the easement information provided. One commenter suggested that in addition to accurately depicting easement agreements and land ownership in the general management plan, the GGNRA should ensure that jurisdiction is accurately presented in all published GGNRA maps, and that GGNRA law enforcement fully understand those jurisdictions and can communicate those to the public.

Response

Maps depicting the easements will be corrected to accurately show the easements, remove any lands not in the easements and include the (date) conservation easement over the 7.2 acre parcel at the terminus of Sneath Lane – known as the Sweeney Ridge Gateway.

SFPUC requested that all maps and brochures accurately present the GGNRA jurisdiction and that GGNRA law enforcement staff understand and communicate GGNRA jurisdiction. Although this comment is not within the scope of the GMP, this is the practice and goal of the park.

Document Changes

Confirm with Craig Scott the map changes requested are accurate and make needed changes to GMP maps.

Alternatives for SFPUC: Make a text change to Alt description for SFPUC Easements (for each alt) to add: "and Sweeney Ridge Gateway conservation easement" to header with additional text: "NPS acquired a conservation easement over a 7.2 acre parcel at adjacent to the Sweeney Ridge Sneath Lane Trailhead. Management of the parcel will be consistent with the 2007 easement and the restrictions of the 2005 USFWS biological opinion for the PG&E Jefferson-Martin Project. The emphasis of management will be to preserve upland habitat for the California red-legged frog and SF garter snake."

Include the full easement text in the Appendix?

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PUC Scenic Easement and Legislation

Concerns

36455: PUC stated that water operations and all utility functions are expressly excluded from NPS management or restrictions under the terms of the SFPUC easements, and that there is no mention of the fact that the Scenic Easement does not require public recreational access in the Draft GMP. Further, they stated that the Draft GMP should acknowledge the SFPUC watershed management plan and compare it to the Draft GMP alternatives, specifically which project are proposed for the watershed and impacts of new facilities in a closed area. While terming the watershed to be "park lands", and acknowledging that federal legislation controls management activities, there is no mention of the legislation that transferred the easements to the administration of the Park Service. Congress has mandated that the scenic easements shall be administered in accordance with their terms.

Response

The Watershed Management Plan is described in the GMP/EIS in Appendix B, and (also see 36604)

[Add legislation reference](#)" check to see if already there

Document Changes

Add the first paragraph from the SFPUC comment letter (page 3, under heading "Peninsula Watershed Management Plan") to Appendix B description of the Plan. Also, change date of plan in Appendix and elsewhere in GMP text to be consistent with the date that the SFPUC uses (letter uses 2001 but their document on-line uses 2002.)

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Response Topic 14: Adequacy of Analysis

Role of Science and Monitoring

Concerns

36599: Commenters stated that the Draft GMP should be based on sound, peer-reviewed science, long-term monitoring, and site specific evidence. They feel that the analysis in the Draft GMP currently does not rely on scientific evidence and is speculative. Note that most of these concerns relate to dog use and the impacts of recreation. **Note that most of these concerns relate to dog use.**

Response

Specific scientific evidence has been consulted wherever possible in this plan. Specific data is not available for all aspects of the analyses within the plan. The National Park Service uses the best available data, information and science available. For further clarification on how analysis has been conducted in this plan please see responses under the topic of 'recreation' and 'dog walking.'

Document Changes

Change 1:

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Response Topic 15: Requests for Additional Planning and Detail

Response Topic 16: Chapter 1

Chapter 1: Project Information and Background- General

Park Relationships with the Coast Miwok and the Ohlone

Concerns

36466: One commenter suggested that the NPS research treaties that the U.S. (or state of California or other legally constituted governmental bodies) has signed with sovereign Indian nations or tribes to make sure that they are accorded their right.

Response

The obligation for Federal agencies, including the National Park Service, to engage with Indian Tribes on a government-to-government basis is based on the U.S. Constitution and Federal treaties, statutes, executive orders, and policies. GGNRA is committed to fulfilling its Tribal consultation obligations by adhering to the consultation framework in recognition of Indian Tribes' right to self-governance and Tribal sovereignty. The park maintains relationships with the associated Coast Miwok and the Ohlone, and will continue to consult on the General Management Plan.

Note: DEIS Volume I, page 33 has a good statement about incorporating American Indian Values. The three goals mentioned in the original public comment may have been based on this section.

Document Changes

None

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Public Access and New Facilities

Concerns

36623: San Francisco Bay Conservation and Development Commission stated that any project identified in the Draft GMP which requires Bay fill or new shoreline facilities, such as the improvements to the historic Alcatraz pier (Pier 4), should address public access improvements.

Response

A Coastal Management Act Consistency Determination was prepared to ensure consistency with the policies of the Coastal Zone Management Act. Both the California Coastal Commission and Bay Conservation and Development Commission concurred (TBD) with the consistency determinations, which concluded that the preferred alternative would result in beneficial impacts to coastal resources. The consistency determination results is further explained in the FEIS/GMP in the section titled "Coastal Zone Management Consistency," in Volume III.

To do: complete the consistency determinations and submit to CCC and BCDC.

Document Changes

Volume III, page 70: add language that describes the BCDC (similar to description of CCC).

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Coordination with Additional Agencies and Groups

Concerns

36380: Commenters suggested coordinating with additional agencies and groups such as: San Mateo County Historical Association, NOAA (to explore seabird protection and disturbance on Alcatraz Island and coordination of lighthouse properties at Alcatraz Island), the Crissy Field Dog Group, MDG, HRAB, San Mateo County Historical Society, Caltrans, San Mateo County Convention & Visitors Bureau, U.S. Coast Guard, and sailing groups before proceeding to the Final GMP. The California Department of Transportation was concerned with the role of inter-agency coordinators throughout the process and alternatives.

Response

Consultation and coordination in the development of the plan was extensive and is summarized in Vol III Part 12. Between the draft and final GMP/EIS, additional consultation was conducted with some agencies. Additional coordination would be conducted during more detailed implementation planning where NPS actions could affect other public lands, where other approvals are needed, where there are opportunities for collaboration and consistent with Volume 1 - Guiding Principles for Park Management for Civic Engagement, Regional Collaboration and Partnerships.

Specific response to Caltrans, San Mateo Co, others see p 24-25 of LB report

Document Changes

Volume III, part 12: Potential text change in Vol III Part 12 to expand on the consultation with agencies – now only mentions a public agency roundtable.

- Add that we also had informal consultation (State Parks, NOAA, Marin County, community meetings (MBCSD)
- Move “public agency roundtable from p 77 to p 79. Add a couple of sentences about the roundtables, we had 3 (scoping, preliminary alts, review of DEIS)

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DSC Review		
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Document Changes Status		
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Status of Changes	Changes Made By	Date

Management Policy and Map Review

Concerns

36373: Several commenters suggested additional management policies and maps be reviewed, while being in compliance with other plans and policies. Commenters, including the California Department of Transportation, stated that if the Service closes State Route 1 due to a catastrophic landslide, an independent assessment would need to be written and any project in the GMP would need to be consistent with the Bay Plan policies on fish, aquatic organisms and wildlife. The San Francisco Bay Conservation and Development Commission recommended that a determination under the "Coastal Zone Management Act Consistency" would be required prior to implementation of any proposed activities at the recreation area. NOAA suggested that the GMP include the current management policies of: National Oceanic and Atmospheric Administration - Joint Management Plan for Cordell Bank, Gulf of the Farallones, and Monterey Bay National Marine Sanctuaries. FEMA stated that the Flood Insurance Rate Maps for the City and County of San Francisco, San Mateo County, and Marin County were revised in May, 2009 and should be reviewed within the GMP.

Note: Nancy and Brian need to write the text responses re. BCDC, Cal Trans and FEMA.

Response

We acknowledge that San Francisco Bay Conservation and Development Commission's role in making consistency determinations with the San Francisco Bay Plan. Text has been added to the Coastal Zone Management Act Consistency section in V. III to clarify the role of BCDC and that a consistency determination will be required prior to implementation of actions in the GMP.

Document Changes

Page 70: Text on p. 70 needs to add BCDC role, and need for consistency determination to implement actions in the plan. (I couldn't find any place under Implementation Planning that this should be added.)

Concern Response Review Status		
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Chapter 1: Project Information and Background- Editorial, Formatting, NEPA

Marin County, Department of Public Works

Concerns

36545: Marin County Department of Public Works requested that the word "created" be replaced with "to be developed" in a specific section of the GMP. CLARIFICATION: Here is the sentence they wish to revise: Also note that during the Comprehensive Transportation Management plan (CTMP) process, no welcome center was created. CTMP developed several alternatives for the Visitor Center (not a welcome center) that did not have public support due to their scale.

36528: Marin County Department of Public Works noted that the proposed welcome center at Highway 1/Manzanita lacks design details, and requested to see preliminary designs to analyze grades, alignment, and topography to determine grading necessary and to ensure it properly conforms to existing infrastructure.

Response

The GMP has been revised to downsize the welcome center to a transportation hub that would include parking, interpretation, and shuttle stop. The revised language is located in preferred alternative for Muir Woods National Monument.

Document Changes

Vol. I, page 317: rewrite description of Welcome center. It is now a transportation hub, or something similar. It would include parking, shuttle stop, interpretation, possibly a kiosk. It may be leased, not purchased, but will be left open in the GMP.

Concern Response Review Status		
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Public Comment Period and Public Meetings

Concerns

36379: Commenters expressed that the 60 day comment period should be lengthened by two months. Commenters also stated that more public meetings should be held and better publicity should be used to notify the public of the Draft GMP. One additional commenter expressed discontent with open houses and suggested that public hearing format should be used.

Response

The public comment period was extended 30 days to accommodate public requests (the public comment period was from September 9, 2011 through December 9, 2011).

During the public comment period, multiple opportunities were provided for public input. This included three meetings held in San Francisco, Pacifica, and Mill Valley, California. However, public meetings were not the only opportunity the public had to provide comment. Comments were also accepted through the Park's website.

Open houses are a type of public meeting frequently used by GMP planning teams because they are designed to encourage people to engage in conversation with members of the planning team. The primary purpose of the open houses for the planning team is to listen.

Open houses give more people an opportunity to offer comments without the pressure of public presentation — we often receive more information from participants because of the ability to talk in small groups rather than be intimidated by speaking into a microphone in front of a large group. This format allows participation by all types of people with all types of communication styles and prevents any one interest from dominating. Also we believe we get better information one-on-one or in small groups than we do in large meetings. It allows us to respond better to individual questions and concerns.

The public open houses were just one tool used to collect verbal and written comments on the Draft GMP. Meetings were advertised through a press release, postcard and email sent to the park's mailing list, the park's website, the NPS's Planning, Environment and Public Comment (PEPC) website, and through Twitter. Postcards and flyers were also available at visitor destinations throughout the national recreation area.

Document Changes

None

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Addition of Terms

Concerns

36539: Commenters, including Marin Audubon Society, requested that additional terms in the Draft GMP be added to the definitions section of the document including compatible recreation, exotic species, non-native species, invasive species, family events, aggressively addressing, external threats, backcountry, controlling access, and sustainability.

Response

Additional terms have been added to the glossary, and others have been changed to clarify their meanings. The changes are as follows:

1. Add definitions to glossary for non-native, invasive species and change "exotic" to "non-native" per discussion with Daphne.
2. Sustainability is defined in glossary (see VOI III p 164)
3. The terms: backcountry, aggressively address, controlled access, and external threats are all in the intro to the Natural Zone – team should work on a re-write. We have changed terms to remove "aggressively address" in Steering Comm., "family" events
4. Change "controlling access" to "managing"? – doesn't seem to need a definition
5. Change "backcountry" to a more appropriate term

Check rep quotes for others

Document Changes

See above for changes

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Description of the No Action Alternative

Concerns

36632: San Francisco Dog Owners Group stated that the Draft GMP inadequately describes the no action alternative, and therefore the Draft GMP is unfairly biased against the no action alternative.

Response

The no action alternative description fully describes the baseline conditions for each area of the park for the specific topics that are included in the action alternatives, which is used as a point of comparison for evaluating the action alternatives.

Note: This comment is not substantive since it doesn't specifically identify what type of changes are needed to make the no action alternative more similar to the action alternative descriptions.

Comment [MSM3]: If this is not substantive, should we include a response at all?

Document Changes

None

Concern Response Review Status A= Approved, no revisions, R= Revisions made, C=Complete Y=Yes, N=No		
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Document Changes Status C=Completed, P=Partially Complete *Add Notes if needed		
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NA		

Response Topic 17: Chapter 2

Chapter 2: Alternatives- Management Zones

Additional Scenic Values and Opportunities

Concerns

36486: Commenters suggested that there are more scenic values and opportunities within the NRA than the Draft GMP identifies, specifically along trails, the Marin City Ridge, Gerbode Valley, Ocean Beach, Fort Funston, and Muir Beach. In addition, one commenter stated that the proposed Draft GMP management zones do not adequately address the 1980 Natural Appearance Subzones for areas that appear to be natural but are actually high visitation areas.

Response

Brian Aviles? See detailed comment/rep quotes

For response: Rodeo Lagoon and Lands End are not in the Scenic Corridor Zone – Rodeo Lagoon is in the Sensitive Resources Zone, and Lands End is Evolved Cultural Landscape Zone. Fort Funston and Ocean Beach each have Diverse Opportunity Zones in the higher visitor use areas. (other responses cover this comment too)

Document Changes

None

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Extension of the Sensitive Resource Zone

Concerns

36505: Commenters offered suggestions on areas that should be managed as Sensitive Resources Zones, such as: all nearshore/offshore rocks and sea stacks in San Francisco, the Wildlife Protection Area in the Presidio, areas that are seasonally managed for breeding birds on Alcatraz, the Crissy Field WPA, and the

area of Ocean Beach that supports wintering Snowy Plovers. The NOAA suggested that if the GGNRA is expanded to include the area offshore of the San Mateo County coast, that a Sensitive Resource Zone should be designated for the area of Devil's Slide Rock and Mainland from Gray Whale Cove to Pedro Point.

36499: NOAA, USFWS, and PRBO Conservation Science noted support for extending the Sensitive Resources Zone to 300 feet from Alcatraz island's shore, and suggested that buoys will be nearly essential for effectiveness. The San Francisco Board Sailing Association asked if the 300 foot sensitive resource zone necessary, and if so, how it would be enforced.

Response

The zoning map for San Francisco of the Preferred Alternative has been modified to show the offshore portion of the Crissy Field Wildlife Protection Area as a Sensitive Resource Zone. The terrestrial portion of the Wildlife Protection Area is not part of this plan and was addressed in the General Management Plan Update for the Presidio and the Crissy Field Environmental Assessment.

Table 10: Comparison of Alternatives for Alcatraz Island has been corrected to match the description of the preferred alternative related to the Sensitive Resource Zone in the Offshore Bay Environment section, which states that this zone would be demarcated by warning buoys and closed to boats year round. Details of enforcement of the closure would be worked out when the Sensitive Resource Zone is established.

The Sensitive Resource Zone description related to Visitor Experience has been clarified and further limits visitor activities that would be allowed within this zone, to better meet the intention of this zoning designation. In general, visitor access would be restricted or prohibited, particularly during the most sensitive times of the year. The portion of Ocean Beach inhabited by the federally threatened western snowy plover is heavily used by the public and designating this area as a Sensitive Resource Zone would be incompatible with visitor use in the preferred alternative. Designating this area as a Natural Zone allows visitor use to be managed to preserve resources and could involve controlled access.

The nearshore/offshore rocks and sea stacks in San Francisco are dispersed over a broad area and contain lower concentrations of dispersed sensitive resources than the Sensitive Resource Zones identified in the Preferred Alternative. Designation of areas as Sensitive Resource Zones in the plan has been reserved for areas that are highly sensitive to a variety of activities and warrant highly controlled access.

We have updated the map of Proposed Boundary Adjustments to show the proposed zoning that would be applied to the offshore waters in San Mateo County, including a Sensitive Resource Zone corresponding to the Egg Rock to Devil's Slide Special Closure. The proposed zoning would be evaluated at the time the boundary adjustments are enacted and the state lands lease is acquired.

Document Changes

Volume 1, page 184: Correct table to year round closure to boats 300 ft. off of Alcatraz to match language on p. 170.

Preferred Alternative Map: Sensitive Resource Zone description for Visitor Experience needs to be re-written to further restrict public access in this zone.

Sensitive Resource Zone Description: Sensitive Resource Zone description for Visitor Experience needs to be re-written to further restrict public access in this zone.

Volume 1, page 113: The Proposed Boundary Adjustment map on V.1 page 113 needs to be updated to include proposed zoning that would be applied once the boundary adjustments are enacted and we have acquired the state lands lease.

Volume 1, page 103-104: Edits need to be made to the Offshore Ocean Environment, San Mateo County on p. 103-104. We also need to determine the precise location of the southern terminus of the ocean boundary so as to not include Maverick's. Current text is confusing and has some slightly inaccurate statements. This section also requires better justification for the marine boundary expansion in San Mateo per discussion with PWR and NPS Ocean and Coastal Resources office (Jeff Cross).

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Chapter 2: Alternatives- Elements Common to All

Chapter 2: Alternatives- Park Wide

Construction and Birds on Alcatraz

Concerns

36620: The Wild Equity Institute suggested that Wildlife Sensitivity Training should be mandatory for NRA staff and contractors.

Response

Training for contractors to avoid impacting birds during construction (rehabilitation) is addressed in the AIHPSCP. Specific reference to training park staff and contractors has been added to the list of Mitigative Measures.

Document Changes

Volume 3, page 31: Add language to mitigative measures-wildlife

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Costs

Concerns

36526: One commenter expressed concern that the cost estimate for the preferred alternative is too high when compared to the no-action alternative, especially in the current economic climate.

Response

Comparing the cost of the No-Action Alternative with the Action Alternatives can be difficult. NPS planning standards direct planners to only include in the No-Action Alternative the capital costs for projects already approved and funded. Federal approval and funding usually only covers projects to be executed over the next few years. However, the standards also direct planners to identify all major capital expenditures anticipated over the next 20 years for all of the Action Alternatives. This makes a direct comparison misleading since it suggests the No-Action Alternative would be substantially less costly, while it is highly likely that more than \$10,460,000 would be expended under the No-Action Alternative.

Document Changes

None Needed- confirm

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Education and Interpretation Efforts

Concerns

36519: Commenters had several suggestions regarding education and interpretation efforts at the GGNRA, such as: educating the public on invasive species, providing educational films with public TV, educating visitors about the role (of the people in founding and sustaining the park), incorporating carbon emissions reduction into park interpretation, offering educational walks for visitors, and emphasizing the "stewardship," "partnership," and "deep personal connection" that visitors and volunteers experience within the GGNRA.

Response

GMP touches on general interpretive themes but commenter should reference the GGNRA's Comprehensive Interpretative Plan for more specifics about interpretative and stories and themes, areas of emphasis and future recommendations.

Document Changes

None

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NA		

Chapter 2: Alternatives- Alcatraz Island

New Construction and Pest Management on Alcatraz

Concerns

36527: Commenters suggested establishing a roof garden at the top of the Alcatraz Island prison as well as a tunnel network on the parade ground that leads to the agave trail. Commenters also stated that the proposed rehabilitation of the New Industries Building should be limited to outside the waterbird breeding season and such rehabilitation would have negative effects on waterbirds. PRBO Conservation Science stated that if a service kitchen is installed, then a preventative rodent and pest plan should be developed and implemented. The Draft GMP should also include a decision-making method for when, or if, some preservation will not be conducted due to budgetary or other constraints.

Response

[Response w/Abby's additions]

Alcatraz is a National Historic Landmark and as such, any new construction (such as a tunnel under the parade ground) would create an adverse effect to the integrity of the site. The park Integrated Pest Manager maintains plans for the Island. The park adheres to Guidelines in the Alcatraz Island Historic Preservation and Safety Construction Program Final Environmental Impact Statement regarding preservation work on Alcatraz which requires constant consultation and avoiding implementation of projects during the bird nesting season.

The 2010 Cultural Landscape Report Alcatraz Island National Historic Landmark sets clear treatment priorities for rehabilitating structures and landscape features on the island. Solar panels were recently installed on the Alcatraz Cell House roof to reduce greenhouse gas emissions from fossil-fuel based energy production on the Island using renewable energy sources in order to meet current and future energy demands while minimizing cultural and natural resource impacts. Consequently, a roof garden on the prison building is not feasible.

Document Changes

None

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New Facilities on Alcatraz Island

Concerns

36561: One commenter suggested that a second dock at the fixed wharf areas of Alcatraz Island could improve visitor access. This dock should implement new design technology for various vessels, types of operations, technology and new fuel types.

Response

The commentors suggest several actions that could be addressed in future implementation planning for more efficient and sustainable ferry service to Alcatraz. This planning is not within the scope of the GMP. Construction of an additional dock for a second ferry is not necessary or consistent with historic preservation guidelines for the island.

Document Changes

None

Concern Response Review Status		
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Nesting Bird Colonies and Boater Access

Concerns

36549: The Marin Audubon Society suggested restricting boater access around Alcatraz Island as this can cause loss of nesting colonies.

Response

The Preferred Alternative for Alcatraz Island already includes an offshore Sensitive Resources zone that extends 300 feet around most of Alcatraz and is closed to boating year round.

Document Changes

Volume I, 170: Sensitive Resource Zone, Offshore Bay Environment. Revise on page 184 Offshore Area.

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New Industries Building and Special Events

Concerns

36556: One commenter posed questions regarding the availability of the New Industries Building for special events, and the times that those special events would be allowed to occur.

Response

The preferred alternative states that the second floor of the New Industries Building would be rehabilitated as a multipurpose facility. It would include flexible space and accommodate a variety of activities with appropriate controls to minimize impacts during bird nesting season.

NOTE: Daphne to check, Volume I, 169.

Document Changes

???

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Suggested Educational Components

Concerns

36520: Commenters offered suggestions on what educational components should be identified at Alcatraz Island, including: the island's geologic and biotic conditions, the use of the island by indigenous people, the sensitivity of nesting birds, the natural history of the island, the use of alternative energy on the island, and more emphasis on the Civil War era. One commenter also suggested installing buoys at the historic distance from the island. One commenter suggested additional visitation opportunities such as multiple entrances to the cellhouse tiers, adding garden and walking trails to existing tours, and offering additional opportunities for visitors to learn more about the many eras of Alcatraz history. The NOAA suggested using alternative energy by reducing CO2 emissions.

Response

GMP touches on general interpretive themes but commenter should reference the GGNRA's Comprehensive Interpretive Plan for more specifics about interpretive and stories and themes, areas of emphasis and future recommendations. Concerning reducing CO2 emissions, see response to concern #36527.

The preferred alternative includes plans for buoys 300 feet around Alcatraz Island to replicate the historic no trespass zone. While the placement would not be at the exact location, placement would be in close proximity for the purposes of protecting the natural resources and replicating the historic feel of the island.

Document Changes

None

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NA		

Interpretive Sounds

Concerns

36503: One commenter asked if the GGNRA incorporates "typical sounds" for prisoners, meal calls, etc. with the natural soundscape.

Response

GMP does not address interpretive themes and components to the level of detail requested. When visitors experience the island, it is unavoidable to hear the natural soundscape of the island. If they choose to participate in the island's audio tour, visitors can hear the typical sounds of the prison such as clanging metal, footsteps, etc.

Note: Do we want to add volunteer info in beginning of GMP?

Document Changes

None

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Breeding Birds and Sensitive Resource Zone

Concerns

36501: The Golden Gate Audubon Society suggested that areas that are seasonally managed for breeding birds should be given Sensitive Resource Zone designation during the breeding season, and that such areas should be so indicated on the Management Zones Map.

Response

See #3 Birds at Alcatraz in the Comment Response Worksheet for how to address this comment which is related to increased visitor access on the island and breeding areas that are opened to the public in the preferred alt.

All of Alcatraz Island is a National Historic Landmark and since Alternative 3 is about Focusing on National Treasures, designating a Sensitive Resource Zone to protect natural resources on the island was incompatible with this alternative. However, all of the zones would protect native wildlife and wildlife habitat to the greatest extent possible. With the exception of the Parade Ground, the majority of the bird breeding habitat within the Evolved Cultural Landscape zone will be closed to the public during nesting season.

Document Changes

Volume 1, page 168: Consider adding some text to the description of the preferred alternative on V.1 page 168 re. the MAIN PRISON AREA that builds some of the mitigation measures into the alt description.

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Chapter 2: Alternatives- Marin County

Cabins and Camping in Marin County

Concerns

36508: Commenters stated opposition to constructing cabins or other accommodations at Kirby Cove and that development should be confined to areas outside the GGNRA boundaries.

Response

Adding a modest number of rustic cabins to this existing campground would extend the opportunity to overnight in the park to people who might not otherwise come. This is consistent with the concept of Alternative 1 -- Connecting People with the Parks. The number, location, size, and style of the cabins would be determined through more detailed planning that could follow the GMP.

Document Changes

None

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Removal of Facilities within Sensitive Resource Zone and Impacts

Concerns

36500: The Marin Audubon Society noted that the removal of facilities and structures within the Sensitive Resources Zone would have beneficial impacts by removing and restoring existing facilities at Capehart housing, Redwood Creek, Slide Ranch and other sites. They further suggest that any redesigned or new trails deemed essential should be offset by the removal of existing trails nearby.

Response

(The first part does not seem like a substantive comment – expresses a preference for Alt 2 and its greater benefits to restoration.)

Alternative 1 identifies conversion of unnecessary management roads to trails in several locations, reducing the scale of construction. The Trails section (in Common to All) includes a goal of integrating improvements to the surrounding cultural landscape and natural habitats when creating or rehabilitating trails, and converting unnecessary management roads to trails. The park will continue our practice of looking for opportunities to include restoration and removal of "social trails" and disturbance when planning and implementing new trail construction.

Document Changes

These text changes should be made, though not really in specific response to this comment:

Volume ,1 p 138: in 2 places: 3rd bullet and under San Mateo County Trails, second to last line: change "former" to "unnecessary" management roads

(to be consistent with text elsewhere in the doc and to respond to concerns about eliminating needed fire roads.)

Same page: under Marin County Trails: insert "to protect park resources in 2nd to last line of that paragraph, after "sustainable alignments and design"

Concern Response Review Status		
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Document Changes Status		
Status of Changes	Changes Made By	Date

Improvements to Point Bonita Lighthouse

Concerns

36529: Commenters suggested that the GGNRA should improve the Point Bonita lighthouse area, add a bathroom at the lighthouse, redesign the two picnic areas, and have access to the fog horn building.

Response

Recent improvements to the Point Bonita Lighthouse trailhead have been completed and a restroom will be added to this area in the near future.

Ask Michele Gee to respond re: Fog Bldg.

Document Changes

None

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NA		

Updating Historic Structures

Concerns

36530: The Marin Audubon Society and NOAA noted that historic structures should not be updated or expanded (maintaining them is acceptable) and that improving the facilities at Slide Ranch should be weighed against information related to sea level rise, storm surges and known geologic conditions.

Response

The GMP does not plan for expanding historic buildings. Any improvements made to historic structures are based on the Secretary of Interior's Standards for the Treatment of Historic Properties.

NOTE: Have Nancy look at this re Slide Ranch EA.

Document Changes

None

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Volunteer Program

Concerns

36629: GGRO suggested that the Draft GMP include a discussion regarding the volunteer programs in the Marin Headlands, which has trained hundreds of volunteers to become stewards and naturalist advocates for the region.

Response

The GGNRA has over 30,000 volunteers annually that assist in a variety of tasks from stewardship of lands to education of school children. They are critical to the successful management and operations of the parks.

Volunteers are referenced in the Park's Affected Environment section, Park Management, Operations and Facilities. **May need to add to this based on answer to question.**

Document Changes

None

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NA		

Placement of Water Quality Issues

Concerns

36565: The NOAA (GFNMS) requested that the NPS move projects that can improve water quality from alternative 2 into the preferred alternative.

Response

Some changes were made to Alternative 1 in response to scoping comments to enhance the level of restoration in this alternative. This included the removal of all facilities and restoration of wetland and riparian habitat in lower Tennessee Valley resulting in increased beneficial impacts to water quality. If climate change results in unforeseen changes in resource conditions during the life of the GMP, the park would consider additional restoration actions at that time, including those identified in Alternative 2.

Document Changes

None listed ??

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Chapter 2: Alternatives- Marin County and San Mateo County

Chapter 2: Alternatives- San Francisco

Fire Department Operation within the Presidio Trust

Concerns

36472: The Presidio Trust noted that the Draft GMP should note that structural fires within the Presidio are handled by the San Francisco Fire Department and not the Presidio Fire Department.

Response

The appropriate section of the GMP has been corrected.

Document Changes

Vol. II, Part 1, page 181, second full paragraph: Page 181, Park Management, Operations, and Facilities, Visitor and Resource Protection Division, fifth sentence of second paragraph.) Revise to: "...with the park's 2006 fire management plan. Structural fires within the park and in the Presidio are handled by the San Francisco Fire Department. The..." (THE ISSUE IS THAT THE PRESIDIO FIRE DEPT NO LONGER EXISTS. TG)

Concern Response Review Status		
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Review Status	Reviewer Name	Date
DSC Review		
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Document Changes Status		
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Status of Changes	Changes Made By	Date

Potential Centralized Maintenance Facility

Concerns

36481: The Presidio Trust suggested that the Draft GMP be updated to include the discussions between the Presidio Land Trust and the NPS regarding identifying another location for a centralized maintenance facility at a location outside of the cavalry stables.

Response

We acknowledge SFPUC expression of interest in the property and agree that it would make sense to manage this area as part of the SF Watershed since it is within the hydrologic boundary of the Peninsula Watershed. The language in the GMP Boundary Adjustment section states that this would be considered "should the county government declare the property excess", assuming that an internal county process would be complete before it would be identified as excess for NPS consideration. If included as part of the SF Watershed, it may still make sense to include it within the GGNRA boundary consistent with the majority of the watershed, and for the reasons identified in the rationale for the proposed boundary change. In the event that the SFPUC would not be interested, or to facilitate cooperative management, this potential boundary adjustment will remain identified at this time.

Document Changes

None

Concern Response Review Status A= Approved, no revisions, R= Revisions made, C=Complete Y=Yes, N=No		
Review Status	Reviewer Name	Date
DSC Review		
GOGA Review		

Document Changes Status C=Completed, P=Partially Complete *Add Notes if needed		
Status of Changes	Changes Made By	Date
NA		

Maintenance and Facilities at Fort Funston

Concerns

???? (row 80, All Concerns): PUC stated that maintenance and operation of the wastewater facilities at Fort Funston should be part of the proposed alternatives.

Response

language has been added to the alternative description to clarify SF/Daly City wastewater infrastructure easements.

Also see VOI 1 p 26 re easements

Should we add language elsewhere to address all easements in a comprehensive way

Document Changes

Volume 1, page 26: Add text: "Both Zones: work with City and County of SF and City of Daly City to identify the most compatible and sustainable management of their wastewater facilities."

Concern Response Review Status		
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Document Changes Status		
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Access and Infrastructure in Lands End Area

Concerns

36628: San Francisco Public Utilities Commission requested that the alternatives be modified to ensure that they will have continued access to existing infrastructure in the Lands End area.

Response

Re: access to infrastructure at Lands End

Also see VOI 1 p 26 re easements

Document Changes

None

Concern Response Review Status		
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DSC Review		
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Document Changes Status		
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NA		

Bolinas Lagoon Restoration

Concerns

36510: Commenters suggested that Bolinas Lagoon should be within the park's boundary, and that the Draft GMP should identify the measures proposed to protect and restore coastal ecosystems and restore natural processes that affect Bolinas Lagoon. The NOAA stated support for the proposed boundary modifications for the offshore ocean environment in San Mateo County and Bolinas Lagoon in Marin County, with the understanding that the goals and criteria for designating these areas need to be consistent with sanctuary mandates.

Response

The Bolinas Lagoon Restoration Project – Recommendations for Restoration and Management (GFNMS 2008) identified key actions to protect and restore Bolinas Lagoon and its watershed. Three tables identify recommendations for restoration in the Locally Preferred Plan, recommendations for management (Best Management Practices), and recommendations for adaptive management and monitoring. Each action identifies the key land managers, including GGNRA, with a vested interest in implementation of each action. GGNRA involvement would be required to implement restoration actions in portions of the watershed, including improving floodplain function along Easkoot Creek, at the Bolinas Y, and along the east shore of Bolinas Lagoon (e.g. Stinson Gulch), and improving transitional habitat and habitat connectivity along the east shore of the Lagoon.

Document Changes

Volume 1, pages 204,235, 255: Add language in previous column to each alternative description for the Stinson Beach north to Bolinas-Fairfax Road on V.1 pages 204, 235 and 255.

References: Also need to add to references and determine correct citation

Concern Response Review Status
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GOGA Review		

Document Changes Status		
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Chapter 2: Alternatives- San Francisco and San Mateo County

Montara Lighthouse and Shelldance Nursery as Visitor Centers

Concerns

36535: Commenters, including San Mateo County/Silicon Valley Convention and Visitors Bureau, questioned whether the Montara Lighthouse and Shelldance Nursery are appropriate sites for a potential visitor center, citing safety and traffic issues. One commenter requested that the Sharp Park Clubhouse be used as a primary gateway visitor center to the National Park Service on the peninsula.

Response

AVILES Draft response:

The feasibility of a shared visitor facility at the Montara Lighthouse site and for improvements to the Shelldance site will need further analysis before implementation. An example of additional analysis is San Mateo County's Traffic & Trails study (2012) for the Highway 1 corridor between El Granada and Devil's Slide which identified some potential actions to improve safety for people arriving by vehicle and reviewed the potential for a safe bicycle and pedestrian crossing at the site. Access improvements to the Shelldance site could be developed as part of San Mateo County's planned Calera Parkway project which could evaluate the potential to realign the entry on adjacent park property.

HORNOR Draft response:

Visitor center SM county locations

See p 216 re: safe access to shelldance and ML

P 217 "access would be improved" add "safe"?also 219 for ML

Sharp Park is not an NPS property, not in planning area

Document Changes

None

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Document Changes Status		
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Status of Changes	Changes Made By	Date
NA		

Chapter 2: Alternatives- San Mateo County

Trail Improvements at Mori Point

Concerns

36489: One commenter suggested that the trail along the cliffs at Mori Point should be improved from Rockaway Beach to Sharp Park to increase safety and create longer, more scenic hiking experiences. One commenter suggested that places such as Mori Point and Milagra Ridge should have trails comparable to those at Lands End to allow most people to enjoy the area that provides exception scenic vistas without large elevation gains like at Sweeney Ridge.

Response

Non-substantive. These are addressed in Alternative 1 -- pp. 217/218

Document Changes

None

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Document Changes Status C=Completed, P=Partially Complete *Add Notes if needed		
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NA		

Trail Improvements

Concerns

36613: Commenters offered suggestions for which trails could be improved in San Mateo County, and how these improvements could be accomplished. Suggestions included adding signs on San Andreas Trail about Sweeney Ridge, adding more loops to the trail system, and connecting San Andreas Trail to Sweeney Ridge.

Response

Trails

See rep quotes

See p 138 re "loop"

See p 220 re: connection of san andreas trail

Document Changes

None

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Document Changes Status C=Completed, P=Partially Complete *Add Notes if needed		
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Description of Proposed Trails in SFPUC Watershed

Concerns

36614: PUC asked for a clearer description of the proposed trails in the SFPUC watershed. They stated that there is no description of the restrictions in the Scenic Easement on trail access, yet alternatives mention providing such access. Further, the NPS should improve and provide better interpretation of existing connector trails from Sweeney Ridge to coastal areas in Pacifica. PUC stated that more analysis should be done for existing conditions and the potential impacts to resources and if a new watershed trail is to be built, documentation of the effect to watershed resources must be analyzed.

Response

seek construction of a "trail" connecting with a suitable beach unit" under the Scenic and Recreation Easement.

1. Response: The DGMP Alt 1 description for Rancho Corral de Tierra and other areas states that "unnecessary roads" or "unnecessary management roads" could be converted to trails or removed." As SFPUC suggests, prior to closing roads, determining whether they are necessary would include evaluation related to emergency access for fire fighting equipment and personnel. Text throughout the Alt description has been changed to include "unnecessary" consistently in the document where it is not specified
2. **Check Scenic Easement** – is this a "restriction" ?
3. Response: Trail improvements suggested by SFPUC for other areas are included in Alt 1, either specifically, or more broadly with language such as "Trail connections to the community, Sweeney Ridge and adjacent public lands and the California Coastal Trail would be improved in partnership with other land managers" as is stated for Mori Point Language has been added to Alt 1 for Sweeney Ridge to include trailhead improvements at Fassler Avenue as suggested by SFPUC and other commenters.
4. RE: Gregerson boundary comment: reference to SFPUC Watershed acess has been deleted from the significance description for this proposed boundary adjustment.
5. Response: RE: The reference to SFPUC parking resources in the Affected Environment section has been deleted.

Other comments in the rep quotes have been addressed elsewhere.

Document Changes

Document Wide: Search the document for this language: in some places it says "unnecessary roads" in others "unnecessary management roads" and in some "management roads". CONSistently replace with "unnecessary management roads" could be converted to trails...etc.

See 36631 text for Fassler

Volume , 1 p105: delete “through the extensive SFPUC Watershed lands” at the end of the Significance paragraph.

Volume, 2 p 161, par 5: under Traffic and Parking : Delete first 2 sentences. Move 3rd sentence up to preceding paragraph.

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PUC Support for Trail Proposals

Concerns

36615: PUC offered support for trail connections in alternatives 1 through 3, provided that trail proposals are consistent with the Peninsula Watershed Management Plan.

Response

Alt 1 text has been changed to clarify that NPS is offering support, cooperation and collaboration to the trail proposals specifically identified in the Watershed Management Plan and encouraging consideration of other trails that, though not specifically identified in the plan, seem consistent with the Peninsula Watershed Management Plan policies to consider the addition of new trails and connectors in zones of low vulnerability and risk and to limit public trails to the periphery of the Watershed in order to minimize adverse impacts (fire, the spread of exotic weed species, direct impacts to sensitive species, etc.) as noted in the SFPUC comment. (These concepts were discussed with SFPUC prior to including them in the DGMP and we understood that the SFPUC was open to considering them . Is it better not to mention this)

Document Changes

San Francisco Public Utilities Commission Peninsula Watershed

Easements

Re-write this section to separate trail concepts into 2 categories: those specifically identified in the SF watershed Management Plan and those that we are encouraging for consideration. Make other edits in NH mark-up.

Natural Zone (majority of the area, corresponding with the scenic easement)

Park managers would continue to cooperate with the San Francisco Public Utilities Commission for the preservation of the natural, cultural, scenic, and recreational features of the watershed. Within this zone, the park would promote completion of the Bay Area Ridge Trail connection from the Phleger Estate to Highway 92 and a new trail connection between the Bay Area Ridge Trail and the California Coastal Trail on the existing alignment over Whiting Ridge; this would connect Sweeney Ridge with McNear Ranch and Rancho Corral de Tierra.

Scenic Corridor Zone (eastern area closest to Highway 280, corresponding with the scenic and recreation easement) Park managers would promote preservation of natural, cultural, and scenic values with improved public access on trails. Proposed trail improvements include connecting the existing San Andreas multiuse trail to Sweeney Ridge via Sneath Lane, and improving trail access to the Phleger Estate from a new trailhead on Cañada Road. Park managers also would promote the implementation of other trails proposed in the 2002 *San Francisco Watershed Management Plan*, including completion of the north-south corridor through the watershed in areas of low sensitivity. The park would work with the San Francisco Public Utilities Commission to provide a multiuse trail connection through the Peninsula watershed lands between Cañada Road and Skyline Boulevard north of Phleger Estate. Preservation of scenic views along the trails, Cañada Road, Skyline Boulevard, Interstate 280, and its vista points would also be promoted in cooperation with the San Francisco Public Utilities Commission and Caltrans. The National Park Service would collaborate with the San Francisco Public Utilities Commission in creating a watershed visitor education center near the Pulgas Water Temple on Cañada Road, as described in the 2002 *Watershed Management Plan*. Additional coordination with the Juan Bautista De Anza National Historic Trail could also be provided.

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Correction of Trail Names in Document

Concerns

36616: San Mateo County Department of Public Works stated that the Draft GMP references the need for multi-use trail improvements connecting Sawyer Camp I Trail to Sneath Lane, however the multi-use trail improvements would actually be connecting San Andreas Trail, the northern segment of Crystal Springs Trail, to Sneath Lane.

Response

Text in Alt 1 description of Sweeney Ridge has been changed to reference San Andreas Trail, consistent with Alt 1 description for the SFPUC NPS Easement description.

Costs for projects in the SF Peninsula Watershed are not included in NPS costs to implement the Preferred Alternative since implementation of these projects, under the jurisdiction of the SFPUC and included in the SF Watershed Management Plan, would not be an NPS action. As administrator of the Scenic and Scenic and Recreation Easements over the 23,000 acre SF Peninsula Watershed, NPS could support, cooperate and collaborate with SFPUC or San Mateo County to implement these projects. **NPS has offered this assistance specifically regarding the San Andreas Trail connection to both San Mateo County and SFPUC. (should we include this?)**

Document Changes

Volume 1, p217: Text change: Under Sweeney Ridge Scenic Corridor Zone: change "Sawyer Camp " to "San Andreas" Trail

Concern Response Review Status		
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GOGA Review		

Document Changes Status		
Status of Changes	Changes Made By	Date

Proposed Trailhead Improvements

Concerns

36617: San Mateo Department of Public Works stated that there is a lack of detail regarding where proposed trailhead improvements would go, how many would be provided, and that trailhead improvements and better parking accommodations should be studied at the Fassler trailhead.

Response

Trailhead improvements are included in Alt 1 for several specific sites in San Mateo County (Milagra Ridge, Shelldance Nursery/Sweeney Ridge, Mori Point, Pedro Point, and Rancho Corral de Tierra).

Language has been added to text of Alt 1 for Sweeney Ridge to include improved trailhead facilities at Fassler Avenue

Document Changes

None- changes covered in text change from concern statement #36631.

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NA		

Primitive Camping and Potential Impacts

Concerns

36467: PUC stated that there is no explanation of "primitive camping" in the Draft GMP, which makes it difficult to adequately analyze potential impacts, and further that there is no analysis of potential fire hazard impacts associated with "primitive camping" within the Sweeney Ridge area. PUC suggests that prior to closing roads at the watershed, they should be evaluated for emergency access for firefighting equipment and personnel and to refer to the Peninsula Watershed Management Plan policies.

36509: PUC suggested that more information is needed regarding the type of hiker huts that are proposed for Sweeney Ridge under alternative 1, and that there could be a potential for fires or other impacts to watershed resources.

Response

1. For Management roads conversion concern: See response to 36614
2. RE: "extending into the San Francisco Public Utilities Commission Peninsula Watershed." and need to address watershed policies –Response: the Alt description refers only to actions on NPS lands, acknowledging that the importance of this habitat is in part related to the connectivity to SF Peninsula Watershed lands.
3. RE: primitive camping definition – Response: Primitive camping and hikers' hut are both concepts that are described tentatively for future consideration. Implementation would depend on more detailed planning and environmental analysis that would need to confirm feasibility, define proposed locations and project details and address concerns including fire. Consistent with our guiding principles (see Collaboration) and NPS policy, park staff would consult with adjacent land managers, including SFPUC, in development of proposals for lands adjacent to the Peninsula Watershed. Neither concept assumes use of open or other fires.
4. For fire: need to develop this response
 - FM agreements in place
 - FMP - later
 - SFPUC mitigation measures for fire are in their Management Plan to address increased access
 - Unnecessary management roads
 - Already have public access at Rancho
 - NPS management (such as trails) will reduce fire danger – offset increased public access.

Document Changes

Glossary: Define “primitive camping” and hikers’ hut in glossary: team assignment

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Fire-fighting Efforts and Facilities at Rancho Corral de Tierra

Concerns

36618: PUC suggested that if the existing equestrian facilities at Rancho Corral de Tierra include infrastructure that could be used for fire-fighting efforts, an evaluation into whether the potential use of those facilities for fire-fighting efforts outweighs the recreational benefits of those equestrian facilities-and therefore whether the removal of the equestrian facilities should be incorporated into the preferred alternative.

Response

Alt 2 proposes removal/relocation of equestrian facilities from the Sensitive Zone (creek corridors) or further from the creek and potential relocation of removed facilities to the Scenic Corridor Zone, not entire removal from Rancho Corral de Tierra. Fire related infrastructure would be addressed in the Fire Management Plan? – confirm with R. Wong

Document Changes

None

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NA		

Facilities Construction

Concerns

36538: Commenters suggested facilities that should be addressed within San Mateo County, including as: razing the Nike facilities on Sweeney Ridge, erecting signs at Shelldance, and constructing a pedestrian bridge from Mori Point to Sweeney Ridge.

Response

Future planning in consultation with San Mateo County Historical Association would determine the appropriate visitor experience opportunities at Shelldance Nursery. Future actions for the Nike Site at Sweeney Ridge might include removal of the buildings retaining the shell of the buildings so visitors can understand the historic context of the site.

Check with Michele & Nancy. Note—commenter wants to raze Nike Site. Question for Frank: should we remove NIKE facilities at Sweeny Ridge.

Document Changes

Volume 1, page 217: Need text change to mention NIKE facilities and their fate, dependent on group decision. Potential addition about Nike Site on Sweeny Ridge

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Archeological Investigations

Concerns

36465: The San Mateo County Historical Association recommended archeological investigations be conducted to determine the exact whereabouts of the Guerrero Adobe at Rancho Corral de Tierra and the whaling station at Pillar Point.

Response

The park has conducted preliminary archeological investigations on the Guerrero Adobe Site and believes the site is outside the park boundary. Archeological investigations will be conducted at the Pillar Point Whaling Station to determine if it is on, or adjacent to park lands, and to determine proper preservation strategies for the site.

Check with Steve H & Nancy re recent

Document Changes

None

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NA		

Partnerships

Concerns

36523: The San Mateo Historical Association and the San Mateo County/Silicon Valley Convention and Visitors Bureau suggested focusing on the Portola expedition, and making the Sanchez Adobe Historic Site a shared multiagency visitor center.

36460: The San Mateo County Historical Association suggested that the Draft GMP clearly differentiate the explorers Portola and Anza.

????(Row 106): San Mateo County Department of Public Works had concerns with the partnership between the San Mateo County Parks and the San Mateo County Historical Association at the Woodside Store as parking availability is minimal and the community is not inclined to increases in visitation.

Response

We have added language to the GMP indicating that the Sanchez Adobe is an excellent location from which to explore partnerships in preservation and interpretation to enhance our connection to the Pacifica communities and to recognize the importance of both the Portola and the Anza Expeditions. This language roughly parallels to what is stated for the Woodside Store which we understand has limited parking.

Document Changes

Volume 1, page 218:[specific changes not listed]

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Devil's Slide as Sensitive Resource Zone

Concerns

36502: The U.S. Fish and Wildlife Service supports zoning the Devil's Slide Area west of Highway 1 as a Sensitive Resources Zone as identified in alternative 2. Similarly, the NOAA noted that the goals for natural resources are different between alternative 1 (the preferred alternative) and alternative 2, and suggests that limiting access will help to "maintain" the current diversity of the Common Murre and Brandt's Cormorant colonies on Devil's Slide Rock.

Note: Column M in the Public Comment Matrix stated that the decision was about the Offshore Area, while these particular comments were actually about the mainland west of Hwy 1. Zoning of the marine waters was addressed under 36505 above.

Response

The Preferred Alternative has been changed in the mainland area west of Highway 1 at Devil's Slide to adopt the Sensitive Resource Zone identified in Alternative 2 (if these lands are acquired) to provide an increased level of protection for nesting seabird colonies on Devil's Slide Rock and the adjacent mainland.

Need to send an email to Dave Holland, San Mateo County Parks, about whether Sensitive Resource Zone would be compatible with their planning for the trail along Hwy 1 when its abandoned.

Need to clarify land ownership in this area.

Document Changes

Alternative 1 Map of San Mateo Cnty: Change Alternative 1 Map of San Mateo County to match zoning on the Alternative 2 Map in this area.

Volume 1, Alt 1, page 218: Add the text from V. 1 Alt 2 p. 243 for the Sensitive Resource Zone (Devil's Slide Area – mainland west of Highway 1) to Alt 1 on page 218 under Pedro Point, Devil's Slide and San Pedro Mountain.

Environmental Analysis: We could add to the environmental analysis about beneficial effects associated with this zoning.

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Improving Recreational Opportunities

Concerns

36555: Commenters provided suggestions for improving recreational opportunities in San Mateo County, such as trail and parking improvements, directional signage, interpretive displays, open access to PUC at Montara Mountain, and continuing existing uses on new park lands.

Response

The goals for the preferred alternative for San Mateo County (Volume 1, page 216) include focusing on the importance of providing access and engaging the community in the newest park lands...key improvements would include a sustainable system of trails that will connect with local communities and contribute to an exceptional regional trail network." In addition, the need for more directional signs and trailhead parking throughout these areas was also emphasized. These goals would allow for consideration of many of the specific ideas provided by commenters. Detailing specific trails and related parking improvements in all areas of the park is outside the scope of this plan. Regarding continuing existing uses on new park lands, these uses have been allowed during the planning process for these new areas as long as they are consistent with NPS law and policy.

Document Changes

None

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Chapter 2: Alternatives- Muir Woods National Monument

Chapter 2: Alternatives- New Elements of the Alternatives

Climate Change and New Alternative Suggestions (Chp 2, Alts, New Elements of Alts)

Concerns

36631: Commenters offered several new elements to the alternatives. New elements included installing public art in the GGNRA, monitoring and managing invasive species (not only non-native species), addressing and clarifying information related to climate change, establishing an interpretive center at Sanchez Adobe, developing parking and signage for the Fassler trail, ~~providing local residents with discounted prices within the GGNRA~~, and that the Lower Redwood Creek site could offer opportunities for program development collaboration between the GGNRA Park Partners and State Parks.

Response *3 different draft responses were provided, see below

AVILES Draft response:

I think we may want to break out the NOAA comments...

They provided constructive suggestions to clarify NPS policy on climate change, park goals for CO2 reduction, and the strategy for including climate change-related mitigation measures during implementation of the preferred alternative. Many of these changes have been made in the final GMP/EIS.

In evaluating NOAA's comments the park re-examined the analysis of projected CO2 emissions and carbon footprint impacts. In doing so, the park noticed that a description of carbon footprint impacts for the preferred alternative (Alternative 1 for Marin, San Francisco, and San Mateo Counties; and Alternative 3 for Alcatraz and Muir Woods) had not been included in the draft plan. A description of CO2 emissions for the preferred alternative is now included in Vol. __, pages __ and ___. The impact analysis concludes that the preferred alternative would **increase/ decrease** gross emissions by ___%.

This would result in long-term, **negligible/ minor, adverse/ beneficial** impacts on the NPS carbon footprint.

HORNOR Draft response:

1. Public and State Parks program collaboration– Michelle Gee writing
2. Brian Aviles climate change
3. Monitoring/managing invasive species: Response: Park currently conducts actions to manage native pest species such as raccoons and ravens such as by preventing access to human food sources. Current management also addresses preventing introduction and spread of invasive species.
4. Language has been added to text of Alt 1 for Sweeney Ridge to include improved trailhead facilities at Fassler AVenue
5. Abby Sue addressed Sanchez Adobe interp center elsewhere
6. Local residents discount – move to non-substantive and address there

Geev Draft response:

Although the General Management Plan does not specifically identify installations of public art in the GGNRA, GGNRA partners with Headlands Center for the Arts on art related projects and NPS has previously, currently and expects future public art projects. In addition, NPS recognizes art as a way to engage new audiences and offer fresh perspectives on park experience as addressed in NPS's Call to Action document, in which GGNRA has embraced.

While GGNRA does not currently provide all local residents with discounted prices, the GGNRA does give entrance fee waivers and scholarships to many local school groups visiting Alcatraz and Muir Woods.

Parking lot – do we have the authority to give locals a discount? NOTE during group discussion: this part of the concern statement/rep quotes is non-substantive. Remove from concern statement, rep quotes, and response.

Program development and collaboration between the GGNRA Park Partners and State Parks at Lower Redwood Creek is consistent with GGNRA's Guiding Principles for Park Management. Under the Partnership section, partnership will continue to be an important way to accomplish the park's mission and build a community of stewardship.

*See Abby Sue about Sanchez Adobe and Nancy about Falser Trail

Document Changes

AVILES Document changes:

Volume 2: We will need to update the plan in 2 places in volume 2: Carbon Footprint -- GGNRA incl. Alcatraz (Alt. 1 -page 224, and Alt. 3-page 226), and possibly Carbon Footprint -- Muir Woods (page

335). Include new emissions projection based on ALCA solar project (all Alts.) and reduced bldg SF in Alt. 3. may already be accounted for. [Laura Castellini] Check assumption about increased visitation and ferry service for all alts.

Suggested structure: Describe that the pref alt includes Alt 1 for the 3 counties plus Alt 3 for ALCA and MUWO. Give the projected MTCE and % increase for the counties (1 number), ALCA and MUWO. Then make the conclusion statement about overall % **increase/ decrease**, and impact level.

Volume 2, page 25: Add "Climate change response strategy" and "Sea level rise vulnerability study" to the NR list on V3, p. 25 (Implementation).

Volume 1, page 50: -- Concept 1, Goals, Natural Resources, 1st bullet: "Maintain the integrity and diversity of natural resources and systems to respond to the urban pressures and climate change."

HORNOR Document changes:

Volume 1, page 217: Text for Fassler response: insert Vol 1 p 217 – Sweeney Ridge natural zone:
"Improved trailhead facilities would enhance the connection to the community at Fassler Ave" before last sentence in that section: "Connections to the regional trail network..."

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Chapter 2: Alternatives- Preferred Alternative (General)

Suggested Elements for Alternatives

Concerns

36640: Commenters had several suggestions regarding alternative 1, including: limited public access areas and facilities should be preserved to allow Park Partners to conduct their work; directly reflect the intended recreation that was envisioned in the enabling legislation; alternative 1 does not create a

greater "connection" with the park than the other alternatives; and that recreation, the health and well-being of people, and the impact on local communities are topics that are not identified as goals within alternative 1.

Response

Regarding the comment that the goals do not include the concepts of recreation and health and well-being, several aspects of Alternative 1's concept description and goals embrace these ideas. The concept description includes a statement that "park management would focus on ways to attract and welcome people, connect with park resources, and promote enjoyment, understanding, preservation and health - all ways to reinvigorate the human spirit." Also, several goal statements relate to the concepts of encouraging a wide range of visitor opportunities in a diversity of settings that meet the interests of visitors. (page 20 of the executive summary). Regarding the comment on preserving access for park partners, the plan includes a guiding principle on continuing the legacy of park partnerships, along with guidance working with partners in the common to all action alternatives. Regarding the concern about the naming of alternative 1 as "connecting people to parks" and the application of this alternative to Alcatraz Island, it's important to clarify that Alternative 3, "focusing on national treasures" is the preferred alternative for Alcatraz. The commentors suggestions included for Alcatraz (e.g., the should include (1) opportunities to appreciate the major values of the island, (2) adequate signage and other interpretative information, and (3) a diversity of attractive features that showcase the island's natural, historic, and ethnographic values, are all consistent with the concept and goals of the preferred alternative. Regarding the comment that different zones should be developed for each alternative concept, the process used during the GOGA GMP is consistent with National Park Service planning standards. The management zone descriptions represent the reasonable range of desired conditions that are consistent with the park's purpose and significance. The management zones are then applied to the park in different ways to reflect the concept of each alternative.

Document Changes

None

Concern Response Review Status		
A= Approved, no revisions, R= Revisions made, C=Complete Y=Yes, N=No		
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Response Topic 18: Chapter 3

Chapter 3: Affected Environment

Critical Habitat for Plovers

Concerns

36542: The San Francisco Dog Owners Group requested that the Draft GMP clarify that there is no critical habitat for plovers in the recreation area.

Response

Pending Confirmation of Critical Habitat

Document Changes

?

Concern Response Review Status		
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Incorporation of the SFPUC Watershed Plan

Concerns

36469: PUC suggested that including the SFPUC watershed management plan with other plans such as adjacent cities' general plans, bicycle plans etc. diminishes the importance of the SFPUC plan and

disregards the fact that the SFPUC plan governs administration of the San Francisco Peninsula Watershed with SFPUC as the fee owner, much like the more detailed description of the Presidio Management Plan. PUC suggested more detail should be provided regarding the SFPUC watershed plan, and how it would relate to the Draft GMP. PUC stated that the relationship between Golden Gate National Recreation Area and San Francisco Public Utilities is not well defined within the Draft GMP and San Francisco Public Utilities is not mentioned as a participant in shared facilities.

Response

NOTES: consider moving SFPUC Mgmt Plan to another location to give it more prominence (see p 42 and 39)

Text has been added to sections of the document to clarify the relationship between NPS and SFPUC, and to expand the description of the Watershed Management Plan and clarify distinction between "park lands" and NPS SF Watershed Easement areas.

SFPUC have been contribution [???

Document Changes

Need to create text additions: PUC suggested that we include in "CURRENT PLANS FOR OTHER PARK AREAS NOT MANAGED BY THE NATIONAL PARK SERVICE" but this contradicts their concern not to be called a park area. Maybe a new heading "for other areas not managed by NPS – along with State Park plans? See specific pages where SFPUC is concerned about "park lands"

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National Register of Historic Places Listing

Concerns

36462: PUC stated opposition to designating Mile Rock Tunnel as eligible for listing on the National Register of Historic Places, because it is not visible or accessible to the public and therefore has little, if

any, value as a historic place and structural alterations have likely compromised the historical integrity. PUC requested that an assessment is done by qualified experts before it be designated on the National Register.

Response

If improvements are proposed for Mile Rock Tunnel, the park will work in collaboration with the PUC to ensure a professional determination of eligibility is conducted. This will determine whether the property is eligible for the National Register, or not, and fulfill the park's Section 110 compliance under the National Historic Preservation Act. While important, public accessibility is not a factor for evaluating a property for eligibility on the National Register.

Document Changes

None

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Document Changes Status		
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Status of Changes	Changes Made By	Date
NA		

Management of Cultural Resources

Concerns

36464: The Presidio Trust stated that the discussion on cultural resources regarding the Museum Management Division overstates the resources that are overseen by the division, because cultural resources within the Presidio are managed by Presidio Trust staff. Further, the Draft GMP should also disclose that the Crissy Field Ohlone District is not under the exclusive management jurisdiction of the NPS, as one of the two pre-contact archeological sites within the district is on land managed by the Presidio Trust. The Presidio Trust suggests that in order to avoid confusion and to be consistent with NEPA and Advisory Council on Historic Preservation guidance, it would be preferable if the Draft GMP only address those resources in the relevant planning area and APE.

Response

The Area of Potential Effect table in the GMP is meant to give the reader the context for the entire park, and the Presidio of San Francisco is listed as a historic property within the park boundary. The GMP clearly states that area of potential effect encompasses both those areas where proposed actions might occur that would directly impact cultural resources, as well as adjacent areas that contain resources that might be indirectly affected.

The park manages a significant number of museum collections that were transferred from the United States Army and include materials with that have a Presidio of San Francisco theme. These materials, associated with the Presidio and the Bay Area's other 6 forts are managed collectively for their bearing on military history in the area.

Document Changes

Volume II, page 83: Delete "The park includes more than 700 historic structures" and change language to "The park planning area included in the General Management Plan includes over 366 historic structures , 5 national historic landmarks....."

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Information Concern Birds

Concerns

36458: U.S. Fish and Wildlife Service and NOAA stated that information about the birds using Bird Rock (Marin County), Devil's Slide and San Pedro Rock should be added into the Draft GMP for a more comprehensive report.

Response

Add text to GMP

TO BE WRITTEN

Document Changes

Affected Environment and Environmental Consequences: Yes, we should add information about nesting seabirds at Bird Rock, Devil's Slide and San Pedro Rock (are there marine mammals here as well?) to the affected environment and environmental consequences section. All three of these rocks are part of the California Coastal National Monument (add reference to this as well). FWS can provide additional info for the affected environment. The designation of waters around Bird Rock and Devil's Slide as Sensitive Resource Zones would have beneficial effects by limiting public access close to the seabird breeding colonies. San Pedro Rock would be surrounded by Scenic Corridor Zone and receive less protection but would be consistent with the Marine Protected Area designations by the State. San Pedro Rock may have fewer sensitive resources.

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Fundamental Resources and Values

Concerns

36476: NOAA recommended including additional language regarding visitor opportunities at Alcatraz Island, such as learning about the natural history of San Francisco Bay.

Response

This comment from NOAA refers to the Foundation Statement for Alcatraz Island. The fundamental resources and values are those that directly contribute to the significance for which the park was established. Alcatraz Island is designated a National Historic Landmark for its significance as the site of pre-Civil war fortifications, the nation's first military prison, the maximum security prison, and the American Indian occupation. The Island's highly significant natural resources are included under the Coastal Corridor Foundation Statement. The Coastal Corridor statement is general in nature because the park's enabling legislation does not mention specific natural resources and the Alcatraz water bird colonies were not present when the park was established.

Note: Concern Statement was not an accurate representation of the question.

Document Changes

None

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San Francisco Veterans Administration Medical Center

Concerns

36461: One commenter stated that the text of the Draft GMP should reflect awareness that the San Francisco Veterans Administration Medical Center has tried at least twice to annex parts of both East and West Fort Miley, and that better protection for East Fort Miley would be accomplished, in particular, by amplifying its description throughout the final GMP. Additionally, signage on the grounds should make the whole-and-parts story of Fort Miley clear.

36522: Commenters, including San Mateo County/Silicon Valley Convention and Visitors Bureau, suggested that Fort Miley is an ideal location to interpret the origins of the park.

Response

As stated by the commenter, Fort Miley was a part of the defense system of the strategic harbor of San Francisco. Today, the fort is managed in three parts, east and west Fort Miley are managed by the NPS, and a 29-acre site in between is the San Francisco Veterans Administration Medical Center. [Discuss why Fort Miley is an important site in the creation of the park-Nancy/Brian.] As suggested, changes to the GMP have been made to highlight the importance of the fort through interpretation. The NPS will continue to collaborate with the VA on the interface between park and VA lands, and this has also been noted in the GMP preferred alternative.

Document Changes

Page 213: Add a new section titled "In Both the Evolved Cultural Landscape Zone and Park Operations Zone." First doc change below would fall under this heading?

Page 213: Page 213 of document, add language: "The park will continue to collaborate with the Veterans Administration on the interface between park and VA lands, and compatibility of site use." Brian/Nancy to write.

Page 213: Also on page 213, add bold text to the following sentence: "to interpret its history **and** importance of the site in the creation of the park and provide for park..."

Summary Document: Changes will also be made in the summary document

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Response Topic 19: Chapter 4

Chapter 4: Environmental Consequences- Cumulative Impact Analysis

Text Changes

Concerns

36536: NOAA suggested several documents that should be included in the cumulative impacts analysis, such as; the Point Reyes National Seashore Draft General Management Plan and Fire Management Plan; and other plans and projects at the GGNRA, such as the Fire Management Plan, the Dog Management Plan, and the Gulf of the Farallones National Marine Sanctuary Plan, among others. NOTE: This concern statement needs rewriting, because it is just text changes. Editorial only. Part 2, page 8 of NOAA Letter.

Note: Concern statement needs to be edited. they are not recommending a new cumulative scenario, these are text changes

Response

Text in Volume II Implementation and Planning, subsection Natural Resources has been edited to address this comment.

Document Changes

Volume 3, page 39: Edit text on V. 3 p.39 to read “the Gulf of the Farallones and Monterey Bay National Marine Sanctuaries plan”

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Discussion on Cumulative Impacts on Birds

Concerns

36533: The Golden Gate Audubon Society felt that more discussion should be provided for cumulative impacts on birds, including the impact of the common raven and how the enhancement of visitor experiences could negatively impact birds.

Response

NPS and USGS observations and video monitoring of black-crowned night-heron nests indicate that their eggs and chicks??? are a primary food source for common ravens on Alcatraz Island. The presence of ravens may be more directly related to the presence of water bird nesting colonies than to the high numbers of visitors on the island. The park maintains a depredation permit for common ravens from the U.S. Fish and Wildlife Service and would continue to manage common ravens under all alternatives. In addition, food service and picnicking and would be highly managed under all alternatives, with refuse collection and removal from the island occurring daily. The park would also continue to monitor for non-

native pest species on the island to prevent their introduction and establishment. Human disturbance may also result in increased nest predation by ravens. The park would continue to manage visitation and park operations to minimize disturbance to nesting birds.

Text has been added to the Potential Environmental Consequences for Alternative 3, the NPS Preferred Alternative for Alcatraz Island to clarify that the park would continue to monitor and manage common ravens, and non-native pest species on the Island. In addition, visitation and park operations would continue to be managed to minimize disturbance.

Note: Confirm this response with Bill Merkle. p. 7 of the GGAS letter re. cumulative impacts- does this response address their comment???

Document Changes

- **Volume 2, page 244, 1st long paragraph:** Add text to the middle of the really long paragraph, just before the sentence that starts 'The Model Industries...' add

"The National Park Service would continue to manage the common raven population on Alcatraz. The park would also continue monitoring to ensure non-native pests such as rats do not become established on the Island. Human disturbance may also result in increased nest predation by ravens. The park would continue to manage visitation and park operations to minimize disturbance to nesting birds."

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Chapter 4: Environmental Consequences- General Methodology

Chapter 4: Environmental Consequences- Park Wide

Impacts to California Red-Legged Frog

Concerns

36580: PUC suggested that the conclusion of the no action alternative should be compared with the impacts to the California red-legged frog from the other proposed alternatives.

Response

As stated in Director's Order 12, "the no action alternative should be described first as all other alternatives are then compared against changes in the environment from conditions described under the no action alternative projected into the future" (DO-12 Handbook, page 50).

Because the impacts of the no action alternative serve as the baseline for all alternatives, the impacts of the action alternatives are compared to the impacts of the no action alternative in order to clearly understand and present the context, duration and intensity of the new (proposed) impacts. Following the guidance from Director's Order 12, all action alternatives in the Draft GMP are compared against the no action, including the impacts to the California red-legged frog.

Document Changes

None

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NA		

NEPA Endeavors

Concerns

36562: The Marin Audubon Society requested that project specific National Environmental Policy Act be conducted for the projects suggested in the Draft GMP.

Response

The Implementation Planning section of the GMP describes the subsequent studies, planning and compliance that would be conducted prior to implementation of specific actions in the plan. These include fulfilling the requirements of the National Environmental Policy Act, National Historic Preservation Act, and other relevant laws and policies

Document Changes

None

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NA		

Threatened and Endangered Species Information

Concerns

36560: The Marin Audubon Society requested additional information for various species throughout the park including coho salmon and steelhead, Redlegged Frog, Northern spotted owl, mission blue butterfly, and the tidewater goby. They also requested that more information be provided on restoration and mitigation measures, migratory birds, and other bird species that use the recreation area for nesting, foraging, and migratory refueling.

Response

Thank you for your comments requesting more detailed information on threatened and endangered species in the park, including population size, suitable habitat areas, actions that would be taken to protect the species, specific impacts to species from the alternatives, and mitigation measures that would be taken to protect species. We believe that the GMP and EIS include the appropriate level of

detail for a programmatic document. All of the management zones in the GMP (V. I) provide for protection of threatened and endangered species. Mitigative measures for natural resources and threatened and endangered species are identified in V. III, including best management practices and conservation measures. More detailed conservation measures would be developed in consultation with the U.S. Fish and Wildlife Service and NOAA-National Marine Fisheries Service during implementation planning for actions in the GMP.

Thank you for your comments with respect to the lack of evaluation of impacts on habitats and non-threatened and endangered species, including migratory birds that may be declining. The Affected Environment Section of the EIS describes the diversity of habitats and migratory birds found within the park. The Potential Environmental Consequences section of the document addresses potential impacts of the alternatives to these habitats and associated wildlife in the section entitled Natural Resources – Biological Resources, Habitat (Vegetation and Wildlife). Because of the programmatic nature of the GMP and EIS, analysis of potential impacts is also at a programmatic level. Mitigative measures for natural resources are identified in V. III, including best management practices. More detailed environmental analysis and mitigative measures would be developed during implementation planning for actions in the GMP.

Document Changes

None

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Chapter 4: Environmental Consequences- Alcatraz Island

Concerns of Increased Access

Concerns

36597: Commenters expressed concerns regarding access to Alcatraz Island, including the potential impacts of increasing access on sensitive habitat, and ensuring that the Coast Guard access to this site would remain.

36625: The US Coast Guard stated concern that the NRA may be creating a demand for increased Coast Guard services outside of a legislative process which brings sufficient resources to the Coast Guard.

CLARIFICATION: The Coast Guard's concern relates to the expansion of restricted access around places such as Alcatraz Island. They specifically asked whether the NPS would be requesting Coast Guard assets (assistance) in enforcing these zones.

Response

The management zoning and descriptions of the alternatives in the GMP acknowledge the potential for conflict between public access and adjacent sensitive habitats throughout the park, and were developed in a manner that provides for abundant public access while also protecting sensitive habitats.

U.S. Coast Guard boats and personnel would continue have access through restricted areas within GGNRA in the performance of their duties.

Notes: Do we want/need to add any caveats to the USCG access through restricted areas with respect to sensitivity of resources or just continue to work with them to minimize the impacts of their activities?
Need to add response re. requesting assistance from USCG in closed areas or did Nancy or Brain address?

Document Changes

None

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Chapter 4: Environmental Consequences- Marin County

Impact Analysis Concerns

Concerns

36579: The Marin Audubon Society raised questions about the impact analysis of Vegetation and Wildlife Habitat in Marin County for alternative 1 and the preferred alternative. Concerns included not enough information about how alternative 1 would reduce habitat fragmentation and the potential for exotic species, how alternative 1 would reduce erosion through a sustainable trail system and how the preferred alternative would improve current impacts from recreational use, trampling of plants, spreading of exotic species, and increased wildlife impacts.

Should 36560 also be addressed here?

Response

The National Park Service does not agree with Marin Audubon Society's conclusions that the information and analyses in the DEIS are vague and insufficient to support the preferred alternative. While the management zones would allow for certain types of uses and development within them, the description of the alternatives limits the uses and development to restricted areas within the zones. The DEIS includes mitigative measures to protect resources. The Implementation Planning section commits the park to additional planning and environmental analysis before specific actions are implemented.

Note: Marin Audubon Society comments may need to be looked at in totality and pulled into one consolidated response that addresses their overarching concerns. This response is crafted to address these broader comments rather than specifics of habitat fragmentation, potential for exotic species, how sustainable trails would reduce erosion, etc.

Document Changes

Change 1:

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Eradication Program

Concerns

36627: One commenter suggested that an eradication program in Marin County should be implemented for the barred owl because it competes with the federally threatened northern spotted owl.

Response

Spotted and barred owl monitoring and management are part of the park's ongoing wildlife management program and are not specifically addressed in the GMP

Document Changes

None

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NA		

Recreational Development Impacts in Alternatives

Concerns

36590: The Marin Audubon Society asked the NPS to clarify how recreational development impacts under alternative 2 in Marin County would be the same as alternative 1 if there is more development proposed under alternative 2.

Response

The analysis of impacts to Habitat (Vegetation and Wildlife) for Alternative 1 and Alternative 2 has been changed to document that Alternative 2 has greater beneficial impacts than Alternative 1.

Document Changes

Table 20: Change Potential Key Impacts to Habitat in Alt 1 to long-term, minor, beneficial, localized impacts...

Table 20: Change Potential Key Impacts to Habitat in Alt 2 to long-term, moderate, beneficial, parkwide impacts...

Page 240, 242: same text changes in 1st paragraph of conclusions.

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Dune Restoration

Concerns

36626: One commenter suggested that the opening of a portion of the north parking lot at Stinson Beach has negatively impacted the dunes there, and requests that access to these dunes be restricted and the dunes restored. The Marin Audubon Society noted that Bird Rock should be evaluated under alternative 2.

Response

The Preferred Alternative includes dune enhancement at Stinson Beach. Detailed site planning would occur in the future. The park may take more immediate actions as needed in the interim.

Bird Island is included in the Sensitive Resource Zone in Alternative 2. See the map of Alternative 2 for Marin County. The text for Alternative 2 Offshore Ocean and Bay Environments has been modified to add reference to Bird Island.

Note: The Bird Rock/Island question about Alt 2 should be a separate concern statement as the other questions in this concern statement relate to Stinson Beach.

Document Changes

Page 239: Add text on page 239 to the Offshore Ocean and Bay Environment, Sensitive Resource Zone header: Sensitive Resource Zone (offshore areas around Muir Beach and Point Bonita – from Bird Island to Point Bonita Cove)

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Chapter 4: Environmental Consequences- San Francisco

Chapter 4: Environmental Consequences- San Mateo County

Chapter 4: Environmental Consequences- Muir Woods National Monument

Additional Changes to Address

Diverse Opportunity Zones

Concerns- NH listed

Document Changes

P 207 of Vol 1 – Zone name for TV needs to be changed to “Diverse Opportunities Zone”

Need to re-work 2nd paragraph in that zone

Document Changes Status		
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Editorial -Milagra Ridge

Concerns- NH listed

Document Changes

Volume 1, p 217: "Milagra Ridge" heading - text change: insert "Including Lower Milagra Ridge (Connemara) Conservation Easement" in heading

Document Changes Status		
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Status of Changes	Changes Made By	Date

Editorial -Pedro Point vs. San Pedro Point Inconsistency

Concerns- NH listed

Document Changes

Volume 1, p 218: Text (see vol 1 p 218 refers to "Pedro Point" the zoning maps call it "San Pedro Point" may also be called Pedro Point Headlands – need one consistent place name.

Document Changes Status		
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Editorial -Headers on Alcatraz Alts Table

Concerns- Hatch listed

Document Changes

Volume 1, page 180-184: Headers on V.1 p. 180-184 do not match the Alcatraz alternatives table on these pages.

Document Changes Status

C=Completed, P=Partially Complete *Add Notes if needed		
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Editorial -Word change

Concerns- Hatch listed

Document Changes

Volume 1, page 167, 2nd paragraph: Strike the word 'historic' before buoys in the 2nd sentence.

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