

Concern ID	Response	Document changes	Question or Confirmation for the Group?
List one or more concern ID that will be addressed in the response	The questions involved in the concerns must be answered along with rational and explanations for those answers. In addition, an explanation of how the document will be modified. For example 'the effected environment for natural resources has been updated to reflect...'	List what changes in the document will need to be made as a result of the response. This list will be used to modify the actual document.	have a question that should be discussed, or need to confirm your response with the group.
1. Park Purpose			
2. Recreation			
36637 36638 36493 36377	Preservation versus Recreation: A review of enabling legislation needs to be provided along with an explanation of subsequent legislation which has since altered how the park is mandated to approach preservation. This section of the response should also refer readers to the introductory section of the plan and where full legislation is contained in the document. Clarify that the purpose of the park is not being changed in this plan, however additional legislation and mandates require actions of preservation. Describe the balance between preservation and recreation (visitor experience) that is required of park management. Address concerns that too much of an emphasis on backcountry experience is being made and that placing permits or limitations on visitors will adversely impact their experiences.	<ul style="list-style-type: none"> • The introductory section of the plan needs to be updated with subsequent legislation such as the Redwood Act which now shape park management actions concerning preservation and recreation. • 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. • 	<ul style="list-style-type: none"> •
36588	Importance of Education: #15 (Cahill): The importance of education on sensitive resources is included throughout the document, particularly in the user capacity section (Volume	<ul style="list-style-type: none"> • Alternative Concept Description: add the following goal statement to the list of natural 	<ul style="list-style-type: none"> •

	<p>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, consider adding 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."</p>	<p>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."</p>	
<p>36593 36596</p>	<p>Regulation of access: #171 (Cahill): 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 just 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. The acknowledgement of this impact should be added to the cumulative impact section for visitor use and experience.</p> <p>#172 (Cahill): As noted for the previous comment, the 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 just peak times. 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. Additional language should be added to the cumulative impact section for visitor use and experience to acknowledge both beneficial and</p>	<ul style="list-style-type: none"> • Cumulative Impact Section: #171: acknowledgement of this impact should be added to the cumulative impact section for visitor use and experience. • Cumulative Impact Section: #172: 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 	<ul style="list-style-type: none"> •

	adverse impacts on local jurisdictions from the GMP.		
36593	Economic Value #170 (Cahill): 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.	<ul style="list-style-type: none"> • Consider bringing the cumulative impact section (for all topics) from Volume III into Chapter 4 of Volume II to maintain continuity of topic presentation. • integrating an overview paragraph on the social and economic value of the park in the introduction (Volume I, page 3). 	•
36591	Safety #191 (Cahill): 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 (Volume II).	•	•
	Change in visitation: An explanation of the fact that visitor numbers has significant changed since 1980 needs to be drafted. Implications of such visitation change are that the park now has to balance regulating larger numbers and types of activities with protecting resources so that mandates are followed and recreational uses can continue.	•	•
36543	Visitor Surveys: #43 (Cahill) 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).		
36541 36492 36633	<p>Clarification of recreational uses, including on new lands: Clarify that when the plan refers to visitor experiences, recreation is included in this topic. Reference management concept sections in the plan, explaining that information on goals of visitor experience and resource protection can be found in those sections. Reiterate what these management concepts and goals are. Explain that have conducted an environmental baseline as part of NEPA compliance, that recreational environmental baseline is included under the category of "visitor use and experience."</p> <p>#31 (Cahill): Consider striking the portion of the statement "such as guided activities." The NPS may use guided activities in most zones as both a visitor opportunity and management tool. Other types of commercial services in the natural zone would be minimal</p> <p>#97 (Cahill): 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. Clarify that existing uses on newly acquired lands will be evaluated for consistency with NPS regulations and policies. If uses are</p>	<ul style="list-style-type: none"> • Change wording to 'informal sports' in Vol II, 115. • #31: Consider striking the portion of the statement "such as guided activities." 	<ul style="list-style-type: none"> •

	not consistent, they may necessarily be restricted. Other existing uses will be guided by subsequent planning efforts.		
36485 36488 36496 36532 36490 36494 36495 36554	<p>Zoning: 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.</p> <p>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.</p> <p>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.</p> <p>Respond to idea of Fort Funston and Martin Headlands</p>	<ul style="list-style-type: none"> • In 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) • #84: 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). 	<ul style="list-style-type: none"> •

	<p>should be natural zones.</p> <p>#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.</p> <p>#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</p>	<ul style="list-style-type: none"> • 	
3. Birds at Alcatraz			
<p>36577 36487 36506 36507 36618 36624 36583 36584 36578</p>	<p>Impact Analysis in FGMP/EIS:</p> <p>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.</p> <p>Also, the “Potential Environmental Consequences” section</p>	<ul style="list-style-type: none"> • 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 	<ul style="list-style-type: none"> • See GREEN highlighted notes in the responses and document change columns

<p>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.</p> <p>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).</p> <p>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</p>	<p>effects of those decisions in other alternatives (1).</p> <ul style="list-style-type: none"> • Document wide: replace “rubble piles” with “ruins” • Environmental Consequences:: replace “substantial” adverse effects with “major adverse impacts” • Ensure all changes to Alt. 3 impacts to habitat are consistent in both the Analysis paragraphs and in the Conclusion. • 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. <p>Edit the alternative description of the Park Operations Zone for Alternative 3, stating that “<i>visitor access to the Park Operations zone would be extremely limited</i>”.</p> <p>Edit the alternative description of the Historic Immersion Zone (Arrival Area) for Alternative 3 to state that “<i>the overnight accommodations on Alcatraz would be highly supervised to deter guests from disturbing waterbirds and bird habitat on the island</i>”.</p>	
--	---	--

<p>island into the future under the guidance of the NPS Preferred Alternative for this GMP (Alternative 3).</p> <p>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 <i>“the number of incidents of visitor disturbance to Brandt’s cormorants that result in impacts to individual birds during nesting season”</i>. 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.</p> <p>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</p>	<p>[CONFIRMED?]</p> <p>*NOTE: Based on an NPS EQD non-impairment guidance memo dated October 31, 2011, the GOGA FGMP/EIS must address the <u>new</u> 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.</p>	
---	--	--

<p>yard (including the proposed rehabilitation and stabilization work on the Quartermaster Warehouse and Power Plant) “would employ measures to protect nearby seabird habitat”.</p> <p>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).</p> <p>[YES? DOES PARK STAFF WANT TO MODIFY THE ALTERNATIVE DESCRIPTION TO CLARIFY THIS TO ADDRESS A CONCERN/COMMENT?]</p> <p>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.</p> <p><i>Mitigating Maintenance and Construction Impacts to Waterbird Habitat:</i></p> <p>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.</p>		
---	--	--

	<p>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.</p>		
4. Dog Walking			
5. Sensitive Resources Zone “Boating and the Sensitive Resources Zone”			
6. Equestrian			
<p>36512 36513 36514 36516</p>	<p>Equestrian uses: #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.</p> <p>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.</p> <p>#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</p>		

	<p>be shared with State Parks in the interest of advancing protection of creek resources and providing safe trail connections in the watershed.</p> <p>#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.</p> <p>#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.</p>		
7. Maintain Facilities			
8. Transportation			
9. Costs "San Mateo County"			
10. Trails			
11. Sanchez Adobe "San Mateo County"			
12. Presidio Trust "The Presidio of San Francisco"			
13. PUC "Watershed Lands in San Mateo County"			
14. Adequacy of Analysis			
15. Requests for Additional Planning and Detail			
16. Chapter 1			
36466	The park maintains relationships with the associated Coast Miwok and the Ohlone, and will continue to consult on the General Management Plan.		
36527	Alcatraz is a National Historic Landmark and as such, any new construction (such as a tunnel under the parade ground)		

	<p>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 Final Environmental Impact Statement regarding preservation work on Alcatraz which requires constant consultation and avoiding implementation of projects during the bird nesting season. The park has a clear priority for rehabilitating structures on Alcatraz. 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.</p>		
36623	<p>The text in the GMP will be revised to clarify public access improvements in relation to Bay infill or new shoreline facilities. Any project identified in the Draft General Management Plan/EIS which requires Bay fill or new shoreline facilities, such as the development of a water shuttle at Fort Mason and improvements to the historic Alcatraz pier (Pier 4), will address public access improvements and how the projects would provide “maximum feasible access to and along the waterfront.”</p> <p>Can DSC or GOGA provide input on the language that will be inserted in the GMP to clarify this (perhaps a variation of this language?), or possibly the section/page of the GMP?</p>		
36545	<p>The GMP will be revised to reflect this change. The sentence will read as follows:</p> <p><i>Also note that during the Comprehensive Transportation Management plan (CTMP) process, no welcome center was to be developed. CTMP developed several alternatives for the Visitor Center (not a welcome center) that did not have public support due to their scale.</i></p>		

<p>36379</p>	<p>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.</p> <p>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. We need to know what people think, what they know that we don't know, what their concerns are, what their hopes are. In order for people to give us good input, we also need to impart information to them about what problems we think need to address and what the public's role is in helping us.</p> <p>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.</p> <p>The public open houses were just one tool used to collect</p>		
--------------	--	--	--

	verbal and written comments on the Draft GMP.		
17. Chapter 2			
36516	<p>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:</p> <p><i>Tennessee Valley (from Oakwood Valley to the ocean)</i> <i>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.</i></p>	<p>(Vol. 1, Part 5, page 189)</p> <p>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.</p>	
36472	<p><i>Structural fires within the park are handled by the Presidio Fire Department, and structural fires in the Presidio are handled by the San Francisco Fire Department*</i>Needs to be confirmed by GOGA</p>	<p>Add text here: .(Vol. II, Part 1, page 181, second full paragraph)</p>	
18. Chapter 3			
36379	<p>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.</p>		

	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		
36544	The amendment remains unaltered as the plan for NPS management of Area A of the Presidio.	Text change to be made in Volume I, Part 1, page 39, first paragraph will be deleted:	
19. Chapter 4			
36484	The text in the GMP will be revised to clarify this	(Vol. II, Part 1, page 160)	

	<p>collaboration. The sentence will be revised to read: <i>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.</i></p>		
36580	<p>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.</p>		