

PEPC Project ID: 15075, DocumentID: 43168

Correspondence: 542

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Status: Reviewed Park Correspondence Log:
Date Sent: Date Received: 12/12/2011
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Other
Notes:

Correspondence Text

High Level Opposition to the Draft GMP

I oppose the draft foundational purpose and all management alternatives for park lands in Marin, San Francisco, and San Mateo counties; the plan is deceptive and disregards the legislative mandate to "preserve for public use and enjoyment" and "provide for the maintenance of needed recreational open space". The plan effectively seeks to change the enabling legislation which is unlawful without an Act of Congress and also does not restore and maintain the recreational value agreed to when SF transferred Ocean Beach and Fort Funston.

The GGNRA Foundational Purpose should not be to "offer a national park experience". The Purpose needs to specifically include "public use and enjoyment" and "provide for the maintenance of needed recreational open space". Also, recreation needs to be the highest priority goal for evaluating all plans, and none of the plan alternatives provide the needed recreational open space for public use and enjoyment.

Plan to increase not decrease recreational use. Except for highly sensitive areas, remove "involve controlled access" and "aggressively address". These lands are part of local communities where millions of people should be actively encouraged to continue enjoying regular relaxation, exercise, and inspiration that make it one of the most valued and visited lands in America. Allow the same recreational activities to continue on these lands as occurs currently (e.g., dog walking, family events, running, informal sports, picnicking, etc.) I also oppose the eradication of established urban forest and wildlife habitats and the lack of science and public involvement in NPS decision making for the GGNRA lands.

GGNRA Operating "Under the Influence"

The influence of the Golden Gate National Park Conservancy (GGNPC) on the creation of the proposed GMP needs to be investigated. It is not farfetched to wonder about the undue influences of organization like the GGNPC

considering the inappropriate and well documented activities at Hubbell Trading Post (The case of the Indian Trader by Berkowitz). In addition, the following are worrisome:

- 1) Coca-Cola using a GGNPC-type organization to influence the NPS policy at the Grand canyon
- 2) Concessionaire purchasing a home from NPS personnel for an inflated price

This proposed GGNRA GMP is reflective of the GGNPC and other partners. It does not reflect the enabling legislation or the vast majority of the urban population that relies on these parks for much needed open space and for whom these parks were established. Certainly the GGNPC branding and merchandising campaign seems to reflect a major influence and change in the management philosophy of the GGNRA and is reflected in this statement:

"From six core print and poster "icons" in 1998, the GGNPC campaign has grown to include twenty different sites linked within the identity of the Park and has become the language of everything that the Park does."

The GGNP was the branding effort by ad agency Goodby Silverstein (they also did the Got Milk? campaign) for the GGNPC to market all GGNRA and area parks as one park on par with Grand Canyon, Yosemite and other big national parks.

Ignoring Ocean Beach and Fort Funston's role is one sign this plan does not represent public interest but instead simply represents the powerful influence of the GGNPC and other park partners on GGNRA management. The GMP needs to represent facts and true history not a marketing campaign. As an example, the plan introduction completely ignores these high visitation sites and the urban residents in the bordering neighborhoods. Instead the history seems to start with the Crissy Field restoration, which currently receives only about 6% of GGNRA visitation per NPS statistics. With only a small percent of the park acreage, Ocean Beach and Fort Funston alone represent about 1/3 of the entire park visitation and yet are ignored while the GGNPC supported Crissy Field restoration is glorified.

This is also worrisome because I assume the GGNPC controls much of the business operations at Crissy Field. The GGNPC also seems to have taken control of all GGNRA donations and volunteers from the GGNRA. This is represented by the GGNRA website that directs all these activities to the GGNPC website:

The GGNPC has received and stockpiled millions of dollars.

Note that that even the "restoration" seems to be a marketing strategy to solicit donations from people, and these activities should be heavily scrutinized by an organization independent from the GGNPC. The fact that the GGNPC is promoting the GGNRA as the GGNP and controls much of the GGNRA funding is just one more indication that "the tail may be wagging the dog", and the NPS may be catering to the interest of their "partners" instead of the interest of regular American citizens.

In addition, the NPS is and has focused park funding primarily on native plant restoration (aka, cash cows for donation generation) and capturing tourism dollars (e.g., expensive restaurants, lodging, equestrian facilities, tourist hotspots, etc.) with little being focused on the vast majority of people, the local residents, that use the park for their health and well-being. Much of the land was transferred to the GGNRA with the promise to local communities and donors that the land would comply with the legislative recreational mandate. Our government must not allow the land to be high jacked by the supposed GGNRA partners. In addition, the GMP is no place for dishonest marketing spins and fictional writing about the GGNRA and its history.

Park Purpose, Foundation Statement, and History
Enabling Legislation and Park History is not Accurately Reflected

The GMP provides a misleading park purpose and history on the park which disguises the dramatic changes in this plan from the enabling legislation and the 1980 general management plan. The park purpose and history needs to accurately reflect historical records and the enabling legislation.

Enabling Legislation and Park Purpose Background

The park purpose and foundational statements need to reflect the actual park history and enabling legislation; including the primary enabling principles:

- maintenance of needed recreational open space necessary for urban environment and planning
- manner consistent with sound principles of land use planning and management
- protect the recreation area from development and uses which would destroy the scenic beauty and natural character of the area
- preserve for public use and enjoyment

According to the GMP (volume 1 page 14):

The park purpose is a statement that summarizes why Congress and/or the president established the area as a unit of the national park system. It is based on the enabling legislation and the legislative history of the unit. The purpose statement provides the most fundamental criteria against which the appropriateness of all plan recommendations, operational decisions, and actions are tested.

However, the proposed GMP Park Purpose does not reflect either but seems to be a reflection of the GGNPC marketing. The purpose proposed is:

The purpose of Golden Gate National Recreation Area is to offer national park experiences to a large and diverse urban population while preserving and interpreting the park's outstanding natural, historic, scenic, and recreational values.

The following is an excerpted from the Fort Funston Dog Walker Association website at <http://www.fortfunston.org/chapt2.htm>. This provides history of the parks' purpose and values that are not reflected in the GMP.

This addresses the enabling legislation for Golden Gate National Recreation Area. We explain what the enabling legislation is and its significance in the management and operation of Fort Funston. In explaining its significance, we explore what Congress, the courts, the Department of Interior, and the National Park Service's own internal publications say about the enabling legislation. We then apply the facts in this case to the law to set forth the meaning of each statutory mandate.

The Enabling Legislation

The enabling statute for GGNRA is found in Title 16, section 460bb of the United States Code. The statutory mandates of section 460bb are as follows:

- (1) To preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values,
- (2) To provide for the maintenance of needed recreational open space necessary for urban environment and planning,

(3) To utilize the resources in a manner which will provide for recreation and educational opportunities, in a manner consistent with sound principles of land use planning and management,

(4) To preserve the recreation area, as far as possible, in its natural setting, and

(5) To protect the recreation area from development and uses which would destroy the scenic beauty and natural character of the area.

Further, the courts and the Park Service have stated that, in order to more clearly understand each park unit's enabling legislation, the legislative history for each park also must be examined. Legislative history includes the reports of the House of Representatives and Senate, as well as transcripts of hearings before these bodies. Thus, the enabling legislation is comprised of the enabling statute plus the legislative history.

A portion of the legislative history for GGNRA is found in report number 1391 of the House of Representatives. In this report, the House recognized the extreme need for open recreational space in the Bay Area and provided the following additional guidelines regarding the GGNRA:

(1) This legislation will . . . [establish] a new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan area. (Emphasis added.)

(2) Action is required if . . . the relatively natural areas within the city are to be available to satisfy the growing need for outdoor recreational opportunities. (Emphasis added.)

(3) The objective of H.R. 16444 is to assure the preservation of open spaces presently prevailing within the proposed recreation area, to provide public access along the waterfront, and to expand to the maximum extent possible the outdoor recreation opportunities available to the region. (Emphasis added).

Contrast the statute establishing GGNRA with the statute which created another urban recreational area (Gateway National Recreation area, or "GNRA") on the same day in 1972. GGNRA and GNRA were the first urban recreation areas ever created in the national park system.

GNRA was established merely to "preserve and protect for the use and enjoyment of present and future generations" an area in New York. The enabling statute says nothing about (1) "needed recreational open space necessary to urban environment and planning," (2) "sound principles of land use planning and management," (3) "preserving the recreation area, as far as possible, in its natural setting," or (4) protecting the area from uses which would "destroy the scenic beauty and natural character of the area." We believe these four distinguishing provisions were included in the GGNRA legislation on the insistence of San Francisco City officials, specifically to have the meanings which are described below.

What Congress Has Said about the Enabling Legislation

Much has been said throughout the underlying Fort Funston litigation about the mission of the National Park Service. The mission of the Park Service is found in Title 16, section 1 of the United States Code. This section provides that the fundamental purpose of national parks, monuments, and reservations is --

[T]o conserve the scenery and the natural and historic and the wild life therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.

The individuals, however, who are such ardent proponents of the above section completely overlook a related provision in Title 16, section 1a-1. Section 1a-1 was added to the United States Code in 1978 when the laws governing national parks were rewritten to provide that all national parks unit would be governed uniformly.

Congress was concerned that, even though all park units would be governed uniformly, the unique purposes of each park would be overlooked. Accordingly, Congress provided in section 1a-1 that the value and purpose of each park unit would control in the management and administration of each unit, and only Congress could circumvent this. Section 1a-1 provides in relevant part:

The authorization of activities shall be construed and the protection, management, and administration of these areas . . . shall not be exercised in derogation of the values and purposes for which these various areas have been established, except as may have been or shall be directly and specifically provided by Congress. (Emphasis added.)

What this means is that the Congressional mandate for each park unit, as set forth in the enabling statute and accompanying legislative history, are to be the guiding principles for each specific park unit, and the framework for each and every decision affecting a park. Park superintendents may not use Section 1's purposes to override the enabling legislation for each park.

What the Courts Have Said about the Enabling Legislation

Federal courts look to the enabling legislation of particular park units to determine whether the enabling legislation is being applied. We have located two federal district court decisions which specifically explored a park unit's enabling legislation -- the district court in the Northern District of California and the district court for the District of Columbia. The Park Service, therefore, is accountable to the courts for complying with the enabling legislation for each park unit.

What the Department of Interior Has Said about the Enabling Legislation

As explained above, Congress changed the laws in 1978 to provide that all park units would be governed uniformly. In the early 1980s, the Department of Interior revised the federal regulations to reflect this new statutory treatment.

In these new regulations, the Department of Interior properly recognized that each park unit is to be treated in accordance with its own enabling legislation. An example of some comments found in the Federal Regulation when the new regulations were promulgated are as follows:

Each unit of the System must now be given more individual attention in planning and management to ensure that legislative mandates and policy requirements are met. 47 Fed. Reg. 11598 (Mar 17, 1982). (Emphasis added.)

The management tools of 36 C.F.R. "may not be used if they conflict with enabling legislation, such as 16 U.S.C. 1 or the enabling legislation of a specific park." 47 Fed. Reg. 11598, 11599; 48 Fed. Reg. 30252, at 30254 (June 30, 1983). (Emphasis added.)

[T]he Service recognizes the high public value associated with outdoor recreation and fully intends to comply with the legislative history governing the intended public use of these areas. 48 Fed. Reg. 30252, at 30253. (Emphasis added.)

What the National Park Service Says about the Enabling Legislation

The Park Service's internal manuals and publications have numerous references to the necessity of following the enabling legislation. Some examples of these provisions are found in the Park Service's "Management Policies" and "Field Guide to National Park Service Performance Management." These provisions are:

Management Policies

1. Congress has stated in the enabling legislation of most units of the national park system that they have their own particular purposes and objectives.
2. Park managers should ascertain park-specific purposes and management direction by reading the park's enabling legislation or proclamation and determine general management direction, not inconsistent with the enabling legislation, from the organic act. Wide variations exist in the degree to which the laws and proclamations creating the individual units of the national park system prohibit or mandate specific management actions. Where Congress has provided specific guidance on particular management actions, it is to be followed. (Emphasis added.)

The purpose of a park, program or central office is usually defined in, or derived from, the unit's enabling legislation and from other legal documents providing for its establishment. The legislative history, congressional hearings, congressional reports on legislation, presidential proclamations, and secretarial guidelines may also have statements regarding a unit's purpose . . . Purpose statement represents the government's commitment (Congress' expectation) to the public how an area will be managed for the public benefit. (Emphasis added.)

Zone Management Definitions do not Reflect the Enabling Legislation

The enabling legislation is not represented in the Management Zones starting on Page 13 of the Summary. As an example, the Natural Zone appears to represent more than 90% of the GGNRA and clearly prioritizes natural resources and does not mention the primary urban recreational users of these areas. As an example, I would suggest that the following wording would more accurately represent the intent of the enabling legislation for the natural zone:

Zone Concept

This management zone would retain natural, wild, and dynamic characteristics and ecological functions. Natural resources would be preserved while providing for existing recreational needs of an urban population. Natural resource integrity would be restored only if recreational and scenic values are preserved or improved. Trails would be designed, built and maintained to preserve natural resources and their associated values and to promote recreational and scenic values. Modest facilities could be placed in or on the periphery of the zone depending of the recreational needs.

Natural Resources

Natural resource integrity would be maintained for their processes, systems, and values. Rare and exceptional natural resources, processes, systems, and values would be preserved and enhanced. Natural functions and processes could be reestablished in human-disturbed areas of the park to improve and maintain the resource integrity. Cultural Resources Cultural resource objectives would be pursued in collaboration With, and where they complement, natural resource objectives. These cultural resources could be stabilized and preserved to maintain their integrity.

Recreation (not visitor experience)

Visitors would have the opportunity for play, exercise, outdoor adventure, inspiration, education, stewardship, and community building. Visitors would have the opportunity to be immersed in a natural environment and could seek areas where they could experience natural sounds, tranquility, closeness to nature, and a sense of remoteness and

self-reliance. A moderate rate of encounters with other visitors would be expected, but opportunities for solitude might be found in certain areas or times, if a visitor seeks it.

Development and Management

Development would be minimal and would be aimed at facilities that provide access, public safety, and resource protection (e.g., trails, restrooms, and fencing). Nonhistoric or non-culturally significant structures could be removed and the site restored.

Scenic (additional category)

Scenic resource integrity will be maintained. The scenic resources will also be enhanced, if compatible with maintaining other values.

Nature in Neighborhoods Not Backcountry, Sanctuaries, or Pristine Wilderness

The GGNRA is not the equivalent of the vast Yosemite wilderness and should not be misrepresented as an idealized "backcountry" or wilderness. Neighborhood trails and beaches should not be managed to artificially exclude people so that a selected few have "solitary" and narrowly defined recreational experiences and expect others to drive farther away and increase crowding in a few small "diverse opportunity" areas. In the true backcountry, unlike these high usage areas, the low volume of visitation automatically minimizes any long-term impacts on nature, and people receive less guidance and must take greater personal responsibility for personal safety. Higher visitation warrants greater care not less. Also, the GGNRA is not a wildlife refuge; other large areas in the Bay Area and Northern California are designated as wildlife refuges, bird sanctuaries, and critical habitats for endangered birds, but not the GGNRA. All park conditions such as those proposed for Ocean Beach and Fort Funston should not in any way present these areas as being primarily wildlife habitats.

Recreational Value

"Connecting People with the Parks" is a Deceptive Marketing Spin

The label "Connecting People with the Parks" is deceptive marketing that is not reflected in the actual goals and content of the plan. Note "Connecting People with the Parks" should not only about public transportation and facilities but also the principles reflected in the management zones and goals. There should also be different management zones and definitions for each of the alternatives instead of simply presenting a management zone plan that is reflective of the National Treasures and Preserving and Enjoying Coastal Ecosystems alternative goals.

The specific goals defined for the "Connecting People with the Parks" should directly reflect the intended urban recreation envisioned in the enabling legislation and park creation with the addition of other recreational activities (e.g., stewardship, tourism, etc.) and not be a generic NPS set of goals that do not reflect the park values.

Recreation Must be a Primary Alternative Goal for San Francisco, San Mateo, and Marin Lands

Recreation needs to be the highest priority goal for evaluating all plans, and none of the plan alternatives provide the needed recreational open space for public use and enjoyment. Recreation, the health and well*being of people, and the impact on local communities are not even a stated goals of Alternative 1: Connecting People with the Parks, which is the Park Service's preferred plan for all traditional recreation areas. In fact, the entire GMP barely mentions recreation and almost treats it like the authors think it is a distasteful word.

The excerpt below from the GGNRA website explains why recreation, including dog recreation, is such an important Public Health benefit, particularly in dense urban areas:

The fundamental value of nature as integral to our health as a species is one of the precepts underlying the establishment of the national park system. As Director Jarvis pointed out in a recent speech at the Harvard School of Public Health, the connections between personal health and parks have been evident since public parks were

conceived in the 17th century. A growing body of research has documented the significant health benefits of time spent in nature and exercising outdoors. While certainly not a panacea, parks have the potential to play a major role in addressing the nation's current health crisis reflected in the alarming increase in heart disease, diabetes, and obesity.

In recent years, examples of parks being utilized as places of health and wellness by medical practitioners have begun to appear throughout the National Park System, as well as in state, regional and local parks. From the "Medical Mile" in Little Rock, Arkansas, facilitated by the NPS Rivers and Trails Conservation Assistance Program, to a "Park Prescription" partnership between Porter Health and Indiana Dunes National Lakeshore, to the Children & Nature Network, to the new health-based messaging of the East Bay Regional Park District in the San Francisco Bay Area, medical professionals and parks are beginning to team up for mutual benefit.

In September 2010, Director Jarvis established the National Park Service Health Promotion Committee, chaired by Captain Charles Higgins, Director of the NPS Office of Public Health. This committee has planned and organized the Healthy Parks Healthy People US meeting at Golden Gate, and is tasked with helping shape the follow-up to the meeting, and helping explore new opportunities to link the NPS mission to the health of the nation. The NPS Health Promotion Committee has created a web page with information and resources on Healthy Parks Healthy People US. Visit the site at www.nps.gov/public_health/hp/hphp.htm

Recreation not just "Compatible"

Compatible recreation needs to be specifically defined to insure no misunderstandings and should not be used to exclude today's popular recreation. The proposed GMP coins the new phrase "compatible recreation" and shockingly omits activities like running, picnicking, and informal beach sports from the types of allowed activities for about 90% of the land while calling for restoring resource integrity, controlling access, and aggressively addressing external threats to natural resources.

The management zones list allowed activities for each zone, instead of activities that aren't allowed, which can lead to oversights (e.g., sand castles, kites, kite surfing, wind surfing, sun bathing, etc.) and misunderstandings. It also gives the Park Service license to automatically exclude new variations of recreation or to arbitrarily exclude popular recreation. This is similar to what occurred with dog walking which was a traditional variation of walking on these lands and that the Park Service later decided to target for exclusion.

Words like "family events", "aggressively addressing", "external threats", "backcountry", and "controlling access" without providing definitions also give Park Service personnel license to arbitrarily curtail traditional recreational activities.

Social Value and Health and Well-Being of People is Deceptively Hidden and Ignored

The Social and Economic Value of the recreational areas needs to be included in the plan's introduction and summary, not obscured in Volume III of the plan. The public and decision makers need to fully understand how vital the GGNRA is to the health and well-being of millions of people and local communities. The Institute at the Golden Gate is one website highlighting the mental and physical health benefits of healthy outdoor recreation: <http://parkshealthguide.org/park-prescriptions>

Management Plans with "Aggressively" and "Controlled Access" Impede Recreational Value for this and Future Generations

Plan to increase not decrease recreational use. Except for highly sensitive areas and remove "involve controlled access" and "aggressively administer". These lands are part of local communities where millions of people should be actively encouraged to continue enjoying regular relaxation, exercise, and inspiration that make it one of the most valued and visited lands in America. As discussed in the SFSU study on minorities, unfriendly rules and

enforcement will deter everyone including minorities from enjoying the parks.

Management Zone Activities Misleading

Listing "types of allowed activities" is misleading because many people assume that their preferred recreational activity is safe when based on past NPS history it probably isn't. It is well known that any human recreational activity can impact wildlife, and the popular recreation omitted from the list seems indicative of those that have been demonstrated to have a greater impact on wildlife than dog recreation, which is currently being targeted by the NPS for extreme recreational reductions. Dog walking was traditionally assumed to be simply part of "walking" until recently and look what is happening to people with dogs. This plan should not be used as a justification to exclude or extremely curtail existing popular recreation unless it is specifically stated in the plan and the public has been allowed to participate in that decision.

::Table Inserted Here::

Family Events

"Family events" also needs to be defined. Why should family events be highlighted in contrast to any other group? How does this differ from the current permitting process for more than 25 people? I consider going out for a picnic with my family to be an event. Will families need a permit to go out together for a hike or picnic or to play on the beach? I'd recommend that such wording simply be removed and refer to the number of people in a group that requires a permit. Based on my anecdotal observation of other more family friendly parks, increasing opportunities for family events and capability is the park activity most likely to increase latino and Hispanic usage of the GGNRA sites.

Running Events

"Running events" also need to be defined just the same as family events. I often see groups of kids running at Milagra Ridge that seem to be from Skyline College. I also talked with a man that discovered hiking at Sweeney Ridge because of a class at Skyline College. Neither this "running event" definition nor the omission of "running" from the natural zone should be allowed interfere with programs such as those at Skyline that promote healthy exercise in our community.

Recreation Needs to be First Priority for Funding

Recreation facilities and transportation should be identified as having the highest priority for discretionary funding. High visitation areas like Fort Funston and Ocean Beach have almost no facilities, and Stinson Beach facilities are in need of urgent repair. A stated goal of GGNRA is to connect people to parks, yet once they arrive there are not adequate facilities for basic visitor needs, such as water fountains and bathrooms. Private groups have had to install water fountains and perform basic maintenance on them at Fort Funston. Paved walking paths are crumbling and eroding at Fort Funston and at parking areas along the Great Highway at Ocean Beach.

Natural Landscape ? Ocean Beach / Fort Funston / Muir Beach

The proposed GMP management zones does not adequately address the 1980 Natural Appearance Subzones for areas that appear to be natural but are actually high visitation areas. The Scenic Corridor seems to most accurately depict the management needs of these high visitation sites. Note that Rodeo lagoon and Lands End are already proposed for the Scenic Corridor zone. Either a new management zone needs to be developed or Ocean Beach and Fort Funston lands should be put in an updated Scenic Corridor zone. Neither of these sites can be in any way considered backcountry when they receive around 8,000 visitors a day and are the immediate backyard of a densely populated urban area.

In addition, Muir Beach should be added to this group. While Muir Beach is tiny, in and of itself, it gets about 330,000 visits a year, and NPS plans to change it to a natural area without providing any evidence of significant

impacts from recreation on the endangered species in the creek area. This tiny beach is a popular recreational destination for both local residents and for people from Marin and Alameda County.

Recreational Value at Ocean Beach Impeded

The plan 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.

::Graphs Inserted Here::

Visitor Surveys Need to Highlight Impediment of Recreational Value

The GGNRA needs to conduct systematic and routine visitor surveys. Some visitor survey data can be found at the NPS Studies website. Most concerning is that the GGNRA is one of the highest visitation NPS units, and yet surveys are not performed yearly as for other units. Considering the recreational mandate of the GGNRA, this lack of routine park management practices needs to be addressed to ensure that the recreational value of the park is not being further impeded.

Ocean Beach, which is the highest visitation site in the GGNRA, did not have a single survey. However, the nearby Fort Funston, with similar visitation and facilities was surveyed in 2004. The Fort Funston survey highlights park users dissatisfaction with recreation facilities at these high visitations sites that don't even have adequate or well-maintained restrooms.

Visitation Statistics Incomplete

The NPS does not track visitation counts at many sites (e.g., all of San Mateo County sites), and therefore does not have information to help ensure that recreational values are not being impeded by NPS management decisions. Methods for evaluating visitor counts needs to be implemented.

Example Terminology that Diminishes the Recreational Value for This and Future Generations

The Natural Zone terminology in the draft GGNRA General Management Plan could result in people and recreation being excluded in what reads as an attempt to convert more than 90% of the areas into wildlife refuges and pristine wildernesses instead of the legislatively mandated recreational areas where nature is maintained.

[Text from GMP] "The natural resources would be managed to preserve and restore resource integrity while providing for backcountry types of visitor experiences. Visitors would have opportunities to directly experience the natural resources primarily from trails and beaches. Visitor use would be managed to preserve resources and their associated values and could involve controlled access. External threats to resources would be aggressively addressed." (Volume 1, Page 83)

1. These are not backcountry areas. Most are adjacent to urban neighborhoods and are considered the communities shared backyards.
2. Any plans for people to experience the area primarily from the trails and beaches is not like a backcountry experience in other National Parks. In National Parks, few people are in the backcountry and the low visitation helps minimize the impact on natural resources so there are few barriers to where people go in the backcountry once they have a permit. The GGNRA should and cannot be managed in the same manner as the backcountry of Yosemite.
3. Controlled access in the backcountry generally entails permits to disperse the visitors over a large area. These areas are in neighborhoods where people go daily and where more people should be encouraged to go daily. Such backcountry permitting would in no way be appropriate for an urban recreation area.
4. The only "controlled access" that should be deemed appropriate for these areas is barriers/signs necessary for safety, temporary barriers/signs for re-vegetation, or barriers/signs to help reduce extensive erosion or to protect truly sensitive areas.

[Text from GMP] "Native wildlife communities and ecosystem processes would be preserved and restored to the greatest extent possible. Exotic invasive animals would be managed with the goal of eradication in the park." (Volume 1, Page 84)

1. These are recreational areas not wildlife refuges or bird sanctuaries and should be managed as such. While natural resources should be preserved, restoration should not be the primary objective of the areas unless it is compatible with recreational values. This language gives licenses to prioritize restoration over recreation.
2. Many animals, such as coyotes, could be deemed exotic and invasive since they are not native to the area. Instead of focusing on restoring to some period some 250 years ago, the focus should be on maintaining the current biodiversity and minimizing the extinction of the species that exist today. This includes managing species that are deemed "native" but that can eradicate other species if their population expands.

[Text from GMP] "Native vegetation and vegetation communities (including aquatic vegetation) would be preserved to the greatest extent possible with the goal of conserving native biodiversity. Exotic invasive plants could be present, but would be contained and actively managed with the goal of eradication in the park." (Volume 1, Page 83)

Same as bullet 2 for Item 2 above.

[Text from GMP] "Visitors would have the opportunity to be immersed in a natural environment and could seek areas where they could experience natural sounds, tranquility, closeness to nature, and a sense of remoteness and self-reliance. Visitor use would be controlled to ensure that activities and their intensities are compatible with protecting resource integrity." (Volume 1, Page 85)

This focuses on protecting recreational values and integrity and prioritizes natural resources over recreation. In the draft dog management plan from earlier this year, the NPS even deemed an infrequent dog barking to be an impact on the natural sounds and a justification for excluding people with dogs. The draft dog plan demonstrates that this type wording will be used to exclude people and recreation.

[Text from GMP] "Challenge, risk, and testing of outdoor skills would be important to most visitors accessing this lone. There would be limited universal access opportunities. Time commitment to experience this area would typically be an hour or more." (Volume 1, Page 86)

1. While some people may spend an hour or more, the expected time is more likely 1/2 to 1 hour since the majority of the people visiting these areas are from the local communities and are there for daily exercise and not long treks.
2. 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 Sweeny Ridge.

[Text from GMP] "Access opportunities would be subordinate to the natural setting and may be highly managed (i.e., restrictions on access) to protect resources and desired visitor experiences, as necessary. Trail access may be permitted to major destinations and access points." (Volume 1, page 87)

Same as 1 above.

[Text from GMP] "Commercial services would be minimal, such as guided activities." (Volume 1, Page 87)

Guided tours should not be restricted to these urban recreational areas. In addition, the Park Service could interpret this language to prevent activities such as professional dog walking.

[Text from GMP] "Ocean Beach Natural Zone: The area would be managed to protect shorebirds and threatened species and allow natural coastal and marine processes to occur, while providing for a variety of compatible recreational activities. Public safety activities would be continued." (Summary, Page 43)

Makes official the conversion of 2/3 of Ocean Beach into a bird sanctuary and would likely make permanent the exclusion of dogs for most of Ocean Beach. Will also exclude most other active recreational activities from the beaches along the Sunset neighborhoods.

This plan seems more in line with the sensitive resource zone requirements than the natural zone requirements. Considering the agreement with the San Francisco when this land was converted to the GGNRA, all of Ocean Beach should be zone as a diverse recreational zone.

[Text from GMP] "Fort Funston Natural Zone: Fort Funston's islands of native habitat would be extended to form a continuous habitat corridor that supports recovery of native dune habitat including endangered San Francisco Lessingia plants. The northern stretch of beach would be managed to protect shorebirds, coastal bluffs, and bank swallows and to allow natural coastal and marine processes to occur to the extent feasible, while providing for a variety of compatible recreational activities." (Summary, Page 43)

Would close the large sections of Fort Funston to active recreation, including walking with a dog"

This plan seems more in line with the sensitive resource zone requirements than the natural zone requirements. Considering the agreement with the San Francisco when this land was converted to the GGNRA, all of Ocean Beach should be zone as a diverse recreational zone.

[Text from GMP] "Mori Point: Natural Zone: The land would be managed for ongoing restoration of natural habitats and to protect threatened and endangered species while improving the trail system for public enjoyment of the site and its exceptional views and landscapes. Access to Marl Point would be enhanced with modest trailhead and parking improvements.

Trail connections to the community, Sweeney Ridge and the adjacent public lands, and the California Coastal Trail would be improved in partnership with other land managers. Collaboration with adjacent land managers would also contribute to expanded efforts to preserve listed species and their habitats, improving habitat connectivity across management boundaries." (Summary, Page 47)

Mori Point is adjacent to Sharp Park and most trails should be maintained to support high visitation and handicap access. In addition, the trail along the cliffs, while probably not appropriate for those with significant physical disabilities, also needs to be improved from Rockaway Beach to Sharp Park to improve safety and longer, more scenic hiking experiences.

Scenic and Natural Values

Exotic Invasive Vegetation

Incomplete Analysis of Impact of Management Plans for Exotic Invasive Vegetation

The impacts of the zone management plan are not fully evaluated in the environmental impact review for statements such as:

"Exotic invasive plants could be present, but would be contained and actively managed with the goal of eradication in the park.: (volume 1, page 83).

In addition, the plan needs to include a definition of exotic, invasive, and non-native to clarify the scale and intent of

the management plan.

Note that according to the [invasive.org](http://www.invasive.org) website the definition of invasive and exotic species in North America is: "Any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem; and whose introduction does or is likely to cause economic or environmental harm or harm to human health. (www.invasive.org)

GGNRA lands and lands within the GGNRA administrative boundaries contain significant non-native trees (e.g., eucalyptus, Monterey Cypress, and Monterey Pine) that the current native plant advocates are classifying as invasive exotics and that provide significant cultural, scenic, recreational, wildlife, and climate change value. In addition, plants such as cape-ivy, classified as an exotic invasive by these advocates, also provide cultural, scenic, recreational, and wildlife value and is also used to manage poison oak spread, which represents a significant safety value to visitors.

These invasive plants were deliberately planted to improve the scenic and cultural value of the land and "actively managed with the goal of eradication" significantly diminish these values for this and future generations. I am not a tree expert but I believe the foreground of the cover of this plan and the picture depicting the scenic beauty of the area in Volume 1: Page 20 depicts extensive established exotic, invasive trees/urban forests as do many of the pictures throughout the plan. These trees add significant scenic value and were deliberately planted by prior generations and are highly valued by people. Overall, non-native trees add significantly to the scenic value of the entire Bay Area and the GGNRA while sequestering carbon dioxide and absorbing pollutants.

In addition, vegetation typically categorized as exotic invasive are integrated into the current ecosystem and systematically eradicating these could significantly impact the remaining wildlife that depend on the trees and plants. This excerpt from the Bay Area Bird Report that demonstrates the complexity of these relationships and why eradication of existing invasive populations can be detrimental to wildlife and endangered species:

Clapper Rails in San Francisco Bay have decreased dramatically from the tens of thousands that roamed the undiked marshes before the California Gold Rush.

Hunting, then development reduced populations and pushed Clapper Rails into smaller marshes separated by urban landscapes.

More recently, the rail population hit a low point in the early 1990s, likely due to predation by non-native red foxes. The Clapper Rail's rebound during the 1990s was possibly due to fox control but also coincided with the rapid invasion of a tall non-native plant (invasive *Spartina*). This invader benefited rails because it provided nesting habitat and protection from predators and high tides.

Beginning in the mid-2000s, the rail population declined sharply, due in part to the removal of invasive *Spartina*, which threatens tidal flat and marsh ecosystems as a whole. This recent decline may be leveling off, but the future of Clapper Rails in San Francisco Bay remains tenuous. However, we can be hopeful that as thousands of acres are being restored to tidal marsh habitat, California Clapper Rails will be back on the road to recovery.

Eradication of Exotic Plants is Detrimental to Park Value

The enabling legislation calls for protecting:

"the recreation area from development and uses which would destroy the scenic beauty and natural character of the area."

Eradication of invasive exotic plants is a use that will destroy the scenic beauty and natural character of the area.

The zone management plan calling for:

"Exotic invasive plants could present, but would be contained and actively managed with the goal of eradication in the park." (volume 1, page 83)

Maintaining the existing scenic beauty and natural character of the areas also means at least allowing replacement level saplings to develop. Plans should not include either significant removal of established trees or suppressing all

new growth within the grove or area. Monitoring plans should be in place to ensure that scenic values are maintained.

The 1980 General Management Plan highlights the conflict with this proposed GMP. The 1980 GMP specifically calls for the restoration of the non-native Monterey cypress and maintenance of the planted dunes.

Natural Appearance Subzone: (Ocean Beach, Fort Funston, Lands End, Baker Beach, and Rodeo Lagoon picnic area)

To many park users lands in this subzone may appear to be as natural as wilderness areas at Point Reyes, but they are in fact man-created landscapes which in many cases will require the same degree of maintenance as an urban park setting. The primary management goal in these areas will be to continue to accommodate relatively high use levels with a commitment to intensive maintenance in order to retain the appearance of a natural landscape.

Examples of intensive measures that will be required in this subzone include reforestation of Monterey cypress and stabilization and maintenance of planted sand dunes. 1980 GMP.

Missing Prevention of the Introduction of Invasive Species

Management plans should discourage the introduction of new species that are potentially invasive and could negatively influence the existing ecosystem and/or the survivability of the remaining species.

Missing Sound Principles of Land Use Planning and Management

All species that are invasive need to be monitored and managed, not just non-native species. For example, ravens are native but ravens could significantly impact the survivability of other bird species. All species should be managed, if necessary, to ensure the survivability of other species, particularly endangered or threatened species.

In addition, according to Dr. Arthur M. Shapiro, a Distinguished Professor of Evolution and Ecology at UC Davis and a renowned expert on the butterflies of California:

- 1) "Restoration ecology" is a euphemism for a kind of gardening informed by an almost cultish veneration of the "native" and abhorrence of the naturalized, which is commonly characterized as "invasive" and
- 2) "Whatever the reason for desiring to create such a simulacrum, it must be recognized that it is just as much a garden as any home rock garden and will almost never be capable of being self-sustaining without constant maintenance; it is not going to be a "natural" self-regulating ecosystem."

That supports that "actively managed with the goal of eradication in the park" does not present a sustainable management practice as specified in the enabling legislation nor does it maintain the natural values of the land.

Science Not Dogma

Scientific studies and monitoring programs for recreation and the local ecosystems, not just endangered species and non-native species, need to be a core competency of the GGNRA. In order to fulfill the mission to conserve parks unimpaired, the Park Service needs to comply with federal law and Park Service policies and guidance on monitoring. These programs should be the core for maintaining and improving the recreational, scenic and natural value of the park for future generations. The enabling legislation also includes a dictates "sound principles of land use planning and management."

Management decisions that significantly impair park values should require science and not based on NPS preference and anecdotal evidence. Any recreational closures should be supported by detailed and clear evidence that is immediately available to the public and, if challenged, must be independently reviewed. The 2011 Draft GGNRA Dog Management Plan demonstrates that the GGNRA needs to develop a science-based approach to monitoring and analyzing impacts on the natural environment and other park values.

Following are NPS requirements supporting the need for a science-based approach:

NPS Director's Order 12 - 4.2 Environmental Impact Statements - Criteria for Significant Impact:

If something your park is proposing might have a significant impact on the human environment, you must prepare an EIS. It is important, then, to understand how the significance of an impact is gauged. Although significance may often be a subjective judgment, to the maximum extent possible it must be based on the scientific evidence and public input that NEPA provides. Section 4.2 (B) contains the CEQ criteria you should use in deciding whether an EIS may be required. CEQ requires you to evaluate the severity of impacts in several different contexts, if two or more apply.

NPS 2006 Management Policies ? 4.1 General Management Concepts The Service

cannot conduct or allow activities in parks that would impact park resources and values to a level that would constitute impairment. To comply with this mandate, park managers must determine in writing whether proposed activities in parks would impair natural resources. Park managers must also take action to ensure that ongoing NPS activities do not cause the impairment of park natural resources. In cases of uncertainty as to the impacts of activities on park natural resources, the protection of natural resources will predominate. The Service will reduce such uncertainty by facilitating and building a sciencebased understanding of park resources and the nature and extent of the impacts involved.

Similarly, planning for park operations, development, and management activities that might affect natural resources will be guided by high-quality, scientifically acceptable information, data, and impact assessment. Where existing information is inadequate, the collection of new information and data may be required before decision-making. Longterm research or monitoring may also be necessary to correctly understand the effects of management actions on natural resources whose function and significance are not clearly understood.

Other

Mechanisms for Identifying and Making Individuals Accountable for Serious Injuries

A woman, at the SF Supervisor's hearing on the draft dog management plan, was injured while riding and indicated that GGNRA not mechanisms for identifying and holding the individuals accountable for any serious injuries that they cause and for which they are responsible. The NPS need to either establish such a mechanism to protect citizens.

Missing Glossary Items

Many of the terms in the GMP need to be defined to avoid any misunderstandings and redefining of terms by NPS management, partners, the public, and others.

1. Compatible recreation
2. Exotic Species
3. Non-Native Species
4. Invasive Species

Also, in general if types of activities are specifically included and are intended to represent a broader group of activities then that needs to be stated. For example, does surfing include wind surfing, skim boarding, kite surfing, etc. or are these considered a different type activity.

Environmental Injustice

Issues regarding environmental injustice that I raised in public comments should be addressed as part of the GMP. Please see the attached Public Comment on environmental injustice.