

November 4, 2011

Frank Dean, Superintendent
Golden Gate National Recreation Area
Attn: Draft GMP/EIS
Building 201, Fort Mason
San Francisco, CA 94123



Subject: Golden Gate National Recreation Area (GGNRA) and Muir Woods National Monument
Draft General Management Plan/Environmental Impact Statement

Dear Superintendent Dean:

Marin Conservation League (MCL) wishes to express appreciation for the impressive public process and GGNRA staff responses that are evident in the Draft GMP and EIS. MCL commented on the preliminary alternatives in July 2008. With the alternatives “fleshed out” in the Draft GMP/EIS and management zones applied to specific locales, we wish to expand on or qualify our previous comments. MC’s focus continues to be on GGNRA parklands in Marin County.

Alternatives for Marin Parklands (excepting Muir Woods National Monument)

The Draft GMP/ EIS retains the three broad alternatives that were advanced as concepts in the initial planning phase. It identifies Alternative 1 – “Connecting People with Parks” – as Preferred for all GGNRA parklands, including all Marin County sites except Muir Woods National Monument, for which Alternative 3 – “Focusing on National Treasures” – is identified as Preferred. (Only one other site receives this designation, viz. Alcatraz.) Alternative 2 is titled “Preserving and Enjoying Coastal Ecosystems.”

Differences among the three alternatives are subtle but distinct in their emphasis. The Draft GMP/ EIS compares them and has selected the environmentally preferable alternative based on policy expressed in the National Environmental Policy Act:

1. fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings;
3. attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
4. preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;

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5. achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
6. enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources" (NPS DO-12 Handbook, Section 2.7D).

The alternatives are very similar with respect to criteria 1, 2, 5, and 6. The main differences reside in criteria 3 and 4. It is our sense that Alternative 1 was selected as preferred because it provides (3) "the widest range of beneficial uses of the environment"; and (4) "an environment that supports diversity and variety of individual choice."

In our 2008 comments, MCL urged Park staff to place the greatest emphasis on Alternative (Concept) 2 – "Preserving and Enjoying Coastal Ecosystems" – in Marin parklands. Recognizing that eight management zones are really "the heart of the alternatives" and, as such, serve to tailor the broad alternatives to each site or locale (see below), we nevertheless continue to find Alternative 2 most appropriate for Marin County parklands.

Alternative 1 does not ignore natural resources and ecological systems but its focus is on active programs to increase and improve access to the park for a diversity of visitors in the spirit of "people for the parks." Much of GGNRA parkland, from the Golden Gate south, abuts urban areas, and it is entirely appropriate that managing heavy visitor use would be of paramount importance.

In our view, Marin Headlands are geographically and ecologically different from lands south of the Gate. These Marin parklands also abut developed communities, but at much lower densities. They also receive high visitor use, but in a context of semi-wild coastal habitats where animals like bobcats can roam because of uninterrupted territories. Alternative 2 is sensitive to the need to improve visitor access and connect people to the park, but it also gives special attention to restoring and preserving this coastal ecosystem by reconnecting fragmented habitats, working on recovery and survival of special status species and wildlife, and restoring vegetation and other natural processes.

Alternative 2 also emphasizes the historical legacy of settlement of San Francisco Bay associated with the physical challenges of Marin's rugged coastal terrain met by early settlers who were sustained by coastal resources. The ecologically diverse natural systems of the Marin Headlands also provide ideal outdoor classrooms which, along with indoor classrooms at Ft. Cronkhite, can educate both visitors and Marin residents about the sensitivities of these coastal resources and the tools to preserve them for future generations. In sum, Alternative 2 for Marin parklands would fulfill all of the NEPA environmental policy criteria, but recognize the differences from other, more urban, GGNRA parklands.

Preferred Alternative for Muir Woods National Monument

In MCL's previous comments, we did not consider applying Alternative 3 to Muir Woods, sensing that "Focusing on National Treasures" would confer a quasi-museum quality on the Monument. The Draft GMP and EIS present a good rationale for that alternative. Muir Woods

is readily accessible and hosts some 750,000 highly diverse visitors a year, many of them experiencing “nature” for the first time. The combination of a primeval forest ecosystem that inspires awe and the story of its early preservation give the National Park Service a unique opportunity to educate the public in conservation and stewardship. We agree that this may be an appropriate alternative to designate for the Monument. However, we also have some concerns about proposed management zones in the Monument, discussed below.

Management Zones in Marin Headlands and Muir Woods

As stated above, eight management zones have been applied to sites and locales within the Marin parklands. Under either Alternative 1 (preferred in the Draft GMP) or Alternative 2 (preferred by MCL), these “zones” serve to tailor specific locales to appropriate uses. MCL generally agrees with the designations. Those that currently receive and can tolerate more intensive use, such as educational and recreational activities at Slide Ranch, Forts Barry and Cronkhite, Stinson Beach, and the trailhead at Tennessee Valley are appropriately designated as “Diverse Opportunity Zones.” “Scenic Corridor Zone” is an appropriate designation for the heavily-visited Conzelman, Bunker, and McCullough Roads. “Natural Zones” encompass much of the Headlands and areas surrounding more intense uses, and are intended to permit passive recreation such as camping, hiking, bird-watching, etc.

Alternative 2 recognizes these low impact functions by recommending that existing facilities in Natural Zones continue with limited improvements for the sake of public safety and visitor experience. Alternative 1 appears to be more aggressive in actively enhancing and possibly expanding access, such as in the Gerbode Valley and Marin City Ridge lands. MCL is concerned that the undeveloped wilderness-like character of the landscape and ongoing restoration efforts in these areas could be compromised by greater access. On the other hand, expansion of parking and picnicking and an information kiosk at the Tennessee Valley trailhead would be appropriate way to concentrate activity at this important point of access to numerous existing trails.

In Muir Woods National Monument, we agree with most management zone designations. Much of the Monument is designated as Natural Zone and Sensitive Resources Zone, in which visitor access is carefully managed and limited. Improvements to the visitor entry area, removal of parking (already underway), and other visitor amenities are all intended to minimize the footprint of development in the park, with which we agree.

We are concerned that the designation of “Interpretive Corridor Zone,” where visitors “discover and interact” with features of the redwood forest might widen the main Redwood Creek walking corridor and extend additional interpretive (themed) trails into the upper canyon. It is also important that there be a complete separation and control of “cultural” and other uses that would potentially impact Redwood Creek. Protection of this resource should take priority over any cultural use of this site. As important as Muir Woods is as a World Heritage site, the ecosystem must be self-sustaining over the long term. We feel strongly that the Monument must not become an “outdoor museum”!

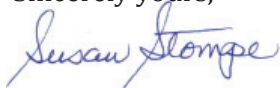
Coordinating With Other Public Lands

MCL made a specific point in commenting on the early alternatives that there should be coordinated management of GGNRA with adjoining public lands, such as the Mt. Tamalpais State Park, Marin County Open Space District, and Marin Municipal Water District watershed lands, so as to accomplish common goals of natural resource protection and preservation in the face of increasing public use. We are pleased that what was originally presented as Alternative 4 – “Collaborating Regionally” – is now treated in the Draft GMP as a general principle that applies to all of the alternatives.

In conclusion

Marin Conservation League appreciates the opportunity to comment on the Draft GMP and EIS for GGNRA and Muir Woods National Monument. It is an impressive document and we look forward to the final Plan to guide the Park for the next 20 years.

Sincerely yours,



Susan Stompe, President



Nona Dennis, Chair
Parks and Open Space

cc. Hon. Lynn Woolsey, U.S. Congress
Paul Helliker, General Manager, MMWD
Danita Rodriguez, Superintendent, Marin District, California Dept. of Parks and Recreation
Linda Dahl, Director, Marin County Parks