

**From:** [Levitt, Howard](#)  
**To:** [Frank Dean](#); [Aaron Roth](#); [Alexandra Picavet](#); [Brian Aviles](#)  
**Subject:** Fwd: Response to your specific GMP concerns  
**Date:** Sunday, February 08, 2015 12:11:51 PM

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Just sent this to Andrea Buffa. Buckle up. Howard

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**From:** **Levitt, Howard** <[howard\\_levitt@nps.gov](mailto:howard_levitt@nps.gov)>  
**Date:** Sun, Feb 8, 2015 at 9:09 AM  
**Subject:** Response to your specific GMP concerns  
**To:** Andrea Buffa <(b)(6)>

Dear Andrea:

Good to see you, however briefly, at the Ocean Beach Fire meeting on Thurs night. We felt it was a great meeting; hope you did, too. I had wanted to talk to you there about the specific areas of the GMP you felt needed clarification after our meeting in December, but got busy with discussions, and by the time I came up for air, you had left.

We thoroughly reviewed all of the comments you sent, and feel that they largely covered all of the points we discussed with you in Frank's office. We feel the that the GMP addresses adequately all of your concerns, and see no reason to alter it.

We offer the following responses to your specific points. They reflect our view, which we stated at the December meeting, that you have a fundamental misunderstanding of the vision in the GMP and the relationship between the GMP and the Dog Management Plan. Despite your stated concerns, we feel the GMP reflects a vision in which recreation remains one of the primary functions of this park, as it has always been. The plan is "consistent with sound principles of land use planning and management," as directed by Congress when it established GGNRA in 1972. Also, the GMP will not predetermine the final preferred alternative in the Dog Management Plan. Dog walking is proposed in the Dog Management Plan/SEIS in areas the GMP describes as both Diverse Opportunity and Natural zones. But in any case, the final preferred alternative from the Dog Management Plan/FEIS, when converted into a federal rule, will be the rule on the ground in the park. The guidance for dog walking in the Dog Management Plan will take precedence over the GMP.

Best,

Howard

Recreation should be one of the guiding principles of the plan. Why has it been omitted as a principle?

**Response:** Recreation, along with conservation, is embodied in the NPS 1916 Organic Act: "...to provide for the enjoyment of the same..." In this phase, recreation is an element of providing enjoyment of the park's scenery, natural areas, and historic objects. The guiding principles that are keyed out in this section relate to some distinctive ways we approach park management. You may want to note the section of the GMP titled Foundation Statements (Volume I, pages 13-24), where we unpack why the park was established. We identify recreation as the first of the park's fundamental resources, meaning that providing recreation is core to achieving Congress' designated mission. Regardless of whether recreation is a guiding principle, the GMP proposes ways to better achieve this mission.

## **2. Park Purpose – page 15**

The plan should remove the language "national park experience" from the park purpose. That language is not found in the legislation that established the GGNRA. This change, similar to the language quoted above, gives the impression that you want to take the recreation out of the recreation area. Did you confer with any members of Congress regarding changing the park purpose?

**Response:** See response above and Volume II, pages 393-393 of the FGMP for our reply to a similar question raised during the comment period of the Draft GMP. "National park experience" very decidedly includes recreation.

## **3. Use levels – page 65**

The plan should state that existing visitor usage levels will be preserved and could be increased to meet the need for open recreational space of the growing population of the San Francisco Bay Area. How did the National Park Service assign the usage levels for the natural zones? In our meeting, you stated that these do not reflect a proposed change in visitor usage levels. How did you measure existing usage?

**Response:** As we said in our meeting, we do not anticipate that the qualitative use levels generally described for particular zones, including natural zones, will change dramatically over current visitation. Zone use levels are general characterizations; they are not based on visitor counts. That said, in places where growth in visitation begins to affect our ability to preserve resources or provide quality recreational experiences, new management actions may be required. I'd ask you to review Section 7 of the GMP which outlines the system of indicators, standards, and management actions we may be implementing at Muir Woods and on Alcatraz Island, two areas with heightened need for special management at this time.

## **4. Visitor Access – page 65**

The plan should state that public access will not be restricted except under specific compelling circumstances. It should not include blanket public access restrictions that align with the management zones. We are confident that you can develop a plan that preserves and protects the natural environment without curtailing public access.

**Response:** We believe the plan characterization of public access is sufficient to allow sound management. There are no blanket public access restrictions in any of the zones. We responded to a similar question about access in the Draft GMP in Volume II, page 395 of the Final GMP.

## **5. Types of activities – page 63**

The recreational activities listed on page 63 of the proposed GMP under the “natural zones” and “diverse activity zones” should include dog walking. Dog walking is mentioned elsewhere in the plan, and there’s no reason not to mention it in this section of the plan, even if the dog walking specifics will be determined by the dog management plan.

**Response:** The listing of particular forms of use is not exhaustive; it is intended to be representative. As proposed in the SEIS for Dog Management, dog walking could occur in both Natural and Diverse Activity zones.

#### **6. User capacity management strategies – page 282**

The plan should explain under what specific circumstances you would employ some of the more severe strategies to restrict public access such as “establishing regulations on visitor activities.” These strategies should only be employed if there are specific compelling circumstances.

**Response:** The plan explains that visitor experience and desired resource conditions will be the determinants of the need for user capacity management strategies – Section 7, Volume I, page 282. These strategies will be developed and employed if and when compelling circumstances arise. We agree that management tools should be used sparingly and explain this a bit further in Volume II, page 395.

#### **7. Relationship between GMP and Dog Management Plan – page 34**

Since the proposed GMP states that only “minor” changes to the plan could be made to ensure it is consistent with the Dog Management Plan, the GMP should not be finalized until the final version of the Dog Management Plan is signed off on.

**Response:** As we explained at the meeting, only the Dog Management Plan, as a specific activity plan, will determine the specific areas and conditions under which dog walking can occur in the park. The guidance for dog walking in the Dog Management Plan will take precedence over the GMP.

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