

From: (b)(6)
To: [Frank Dean](#)
Cc: [Howard Levitt](#); [Brian Aviles](#); [Lehnertz, Christine](#)
Subject: Save Our Recreation comments on the GGNRA general management plan
Date: Tuesday, January 13, 2015 5:29:25 PM

Dear Superintendent Dean,

Thank you for giving us the opportunity to share our deep concerns and suggest changes to sections of the proposed General Management Plan (GMP).

Our overriding point, as you know, is that there should be no reduction to public access and recreation in this urban recreation area. In fact, we believe that as the population of the Bay Area grows so should access to recreational space. We should be increasing visitor access—not decreasing it.

In 1970, just two years before the Golden Gate National Recreation Areas (GGNRA) was established, the Bay Area population was 4.6 million. Today, it is 7.4 million and growing fast. During the time period covered by this draft plan the Bay Area population will double in size from the period when the GGNRA was founded – yet this draft plan proposes a dramatic reduction in recreational space and visitor access. Such a reduction is not in keeping with the founding vision of the GGNRA and should not be included in any new General Management Plan.

Whether or not you intended it, the new plan indicates that the National Park Service will reduce visitor usage and recreational access, because it will turn most of the GGNRA into “natural zones” that are described using the language below (from use pages 57 – 66 of the plan). In our experience, these descriptions are not consistent with the current state of usage in places like Ocean Beach, Fort Funston, Muir Beach, the Marin Headlands, and others:

- “Access opportunities would be subordinate to the natural setting and may be highly managed (i.e., restrictions on access)”
- “Low to moderate use levels would be expected in this zone, with moderate use levels often found at entry points or points of interest.”
- “A moderate rate of encounters with other visitors would be expected, but opportunities for solitude might be found in certain areas.”
- “Visitors ... could seek areas where they could experience natural sounds, tranquility, closeness to nature, and a sense of remoteness and self-reliance.”

In our opinion, the majority of the GGNRA should be managed as diverse opportunity zones where recreation and visitor access are the dominant aspect of the zone. This would align with the enabling legislation and the vision of those who founded the GGNRA – “in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning.”

Below are the specific sections of the plan that we find most problematic, as well as specific questions we have about these sections. We truly hope that you will consider these changes and respond to our concerns and the concerns of thousands of people who have signed our petition.

Guiding Principles – page 7 - 8

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

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?

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?

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.

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.

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.

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.

As you know, we have a broad coalition of people in the Bay Area who are opposed to the proposed General Management Plan, many who believe they did not have the opportunity to provide adequate input. We still believe that the best course would be for you to significantly revise the plan and go through another public input process. This would allow you to do what we consider necessary additional outreach to give the people who will be impacted by this plan a chance to learn about it and provide their feedback.

Thanks very much for your consideration, and I would be happy to meet to discuss any of these details.

All the best,

Andrea Buffa

Save Our Recreation