GOGA TEAM DRAFT GMP – PART II

NO.	INITIAL	SECT.	PAGE	LINE	COMMENT	RESPONSE/ NOTES
1.	DF	General			Part II has a lot of references to our GOGA northern lands (e.g., Giacomini) and PORE references that are not really appropriate for the management area under the scope of the GMP. See comment below	
2.	DF	Introduction	354	6	The description of the legislative area and shoreline implies that the scope of the GMP and resulting alternatives and analyses would cover this area. I think the document should be revised here and elsewhere (similar to the FMP) to state what is actually the geographic scope (including acreage) of the GMP	
3.	DF	Shoreline Processes	361		We may want to characterize the shoreline by substrate type—which reflects dominant nearshore processes. Probably need to check with Tamara. I think the geographic breakout (Marin Headlands, Golden Gate Strait, and SF Peninsula) used is logical. So here's my version- "The park's coastal shoreline along the Marin Headlands, Golden Gate Strait, and San Francisco peninsula comprise a diverse mixture of rocky shorelines, fine-grained beaches, artificial structures (e.g., piers), as well as sites with a mixture of fine-grained and larger substrates. As the name implies, the Marin Headlands are steep rocky headlands such as Tennessee Point and Point Bonita that are unprotected and exposed to high wave erosion and strong currents. In sheltered areas, both large beaches such as Rodeo and Muir Beaches form bars that create lagoonal features behind them. Small pocket beaches are often characterized by steep slopes and a mixture of small and large substrates, Within the Golden Gate strait, the shorelines have a higher percentage of artificial structures such as rubble breakwaters (Fort Baker), seawalls (Alcatraz, Fort Point and Presidio), piers, and riprap bank protection. Much of the San Francisco peninsula shoreline within the park is dominated by Ocean Beach, the park's largest sand beach resource."	
4.	DF	Shoreline Processes	361		If needed, there are shoreline maps that can be generated from NOAA/CDFG Env'l Sensitivity Index or the NPS's Coastal Biophysical Inventory	
5.	DF	Water Resources	367	11	"The National Park Service and partners have been monitoring water quality and quantity to….."	
6.	DF	Water Resources	367	19	GOGA is participating in a streamflow monitoring program with stations on Lobos Creek, Redwood Creek, and Easkoot Creek.	
7.	DF	Water Resources	367	30	Most of the streams in the park…..	
8.	DF	Water Resources	367	39+	Dam construction….have impaired fish passage, reduced available habitats, and have reduced streamflows during summer-fall of dry years.	
9.	DF	Water Resources	368	1-6	Not sure what this paragraph adds—perhaps delete (also refers to Point Reyes streams-Olema and Pine Gulch).	
10.	DF	Water Resources	368	7-14	Move to BioResources section or delete (references to PORE)	
11.	DF	Water Resources	368	41	Add- "Although small, this spring-fed creek has the highest summer baseflows in the park."	
12.	DF	Water Resources	373-374	46&3	Are all the discussed floodplains 100-year floodplains?	
13.	DF	Water Resources	374	35-38	"Some of the external…" This sentence seems inappropriate for GOGA managed lands. Sounds like it is referring more to PORE managed GOGA-north lands	
14.	DF	Water Resources	375	6	Tomales Bay NPS lands managed by PORE	
15.	DF	Water Resources	375	33-35	"BOD (Biochemical Oxygen Demand)…..total phosphorus…. MBAS (methylene blue active substance)…."	
16.	DF	Water Resources	376	5-7	"Consultants, universities…." "…for fecal coliform bacteria.."	
17.	DF	Water Resources	376-377	11-5	This paragraph on streamflow monitoring does not fit under the water quality section. Perhaps move to the surface water subsection on P. 367 or have a new subsection.	
18.	DF	Water Resources	377	2-5	Sentences on WQ at Rodeo Lagoon don't fit under streamflow monitoring. New paragraph? Also, revise last sentence to "….Rodeo Lagoon sediments may contain elevated amounts of metals from past and current activities."	
19.	DF	Water Resources	377	5	Not sure what the NPS 2005a citation—but it sounds like a secondary lit cit? Should primary sources be cited or are secondary sources ok for GMP docs? It looks like NPS 2005a is throughout this section.	
20.	DF	Marine Resources	378+		The organization of habitats is a bit confusing for me. The estuarine resource section is not mutually exclusive of subtidal and intertidal since one refers to tidal elevation. Not sure what to do, but in Biological Resources section (page 382) you lump both marine and estuarine—perhaps you can be consistent and lump estuarine and marine under "habitats" on p 378 by moving "Estuarine resources" subsection on P379-380 to 378 and deleting the "Estuarine Resources" subsection header.	
21.	DF	Marine Resources	378	31-32	I would remove clamming and diving as recreational activities in our intertidal areas. I would add driftwood collection and burning. There are also park operations and non-park facilities that impact our intertidal—beach cleaning on Ocean Beach, sand movement by City of SF. Of greatest impact are probably past facilities and loss of marine/estuarine habitats from filling (e.g., historic Crissy marsh filled, riprap and seawalls along SF shoreline- FOMA, FOPO and Crissy, Fort Baker marsh, etc). There are great historic photos and maps that can be included.	
22.	DF	Biological Resources	383	11	"black turban snail (*Chlorostoma funebralis*)…. bat star (*Patiria miniata*)"	

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23.	DF	Biological Resources	384	2	"Subtidal habitats (depths below mean low water)"	
24.	DF	Biological Resources	379 (Subtidal) &384		General. I'm wondering if we should call out the habitat areas for subtidal waters—water column and bottom(unconsolidated, consolidated, and biogenic [e.g., kelp beds, shellfish beds]).	
25.	DF	Biological Resources	386	1-10	Some of the species are not found in our area- remove delta smelt. "threespine stickleback" "…and embiotocids."	
26.	DF	Biological Resources	386	18-23	"Seagrass beds….and fishes. Eelgrass beds are limited to portions of Horseshoe Cove and the East Fort Baker shoreline between Point Cavallo and the Sausalito Sewage treatment plant…."	
27.	DF	Biological Resources	386		"…as well as high densities of a marine copepod (*Tigriopus californicus*)."	
28.	DF	Biological Resources	386	30	"*Patiria miniata*"	
29.	DF	Biological Resources	386	38-39	Reword "Historical construction…" to "Past shoreline modifications including wetland fill and seawalls dramatically reduced the extent of tidal marsh within the park."	
30.	DF	Biological Resources	387	1-2	Remove Giacomini Ranch?	
31.	DF	Biological Resources	387	21-28	Paragraph on Alcatraz duplicative of info on pages 379 and 383	
32.	DF	Biological Resources	392	10-20	General. Not sure how to deal with "wetlands" here. Would we want to differentiate between freshwater wetlands which seem to fit in this subsection and estuarine and marine wetlands in the Marine and Estuarine Habitat- Page 382?	
33.	DF	Biological Resources	392	34-36	"The remainder of the park has not been field-mapped but contains likely areas of wetland vegetation based on parkwide vegetation mapping results that need field-verification."	
34.	DF	Biological Resources	395	18	"Within San mateo County, historic and current records indicate…."	
35.	DF	Biological Resources	395	24	"(*Dicamptodon ensatus*)."	
36.	DF	Biological Resources	396	1-3	Coho- endangered. Steelhead- threatened	
37.	DF	Biological Resources	398	19-20	"Non-breeding sites can be found from up to 30 meters from water in adjacent dense riparian vegetation (Rathbun et al., 1993)." Citation: Rathbun, G.B., M.R. Jennings, T.G. Murphey, and N.R. Sipel 1993. Status and ecology of sensitive aquatic vertebrates in lower San Simeon and Pico Creeks, San Luis Obispo County, California. U.S. Fish and Widlife Service, National Ecology Research Center, San Simeon, CA. Prepared for the California Department of Parks and Recreation. 103 pp.	
38.	DF	Biological Resources	398	20-24	Replace "No critical habitat…" with "A final rule designating critical habitat identified a small sliver near Sweeney Ridge, San Mateo (71 FR 19243). Critical habitat had been defined… This final rule, however, is undergoing review and revision by the USFWS."	
39.	DF	Biological Resources	398	32	Chinook Salmon- Federal Threatened and Endangered	
40.	DF	Biological Resources	398	34-35	Insert after "…connected to the Pacific Ocean. Chinook salmon have unique populations with distinguishable "runs" based on the timing of upstream migration and spawning period. Winter-run chinook are listed as endangered. Central Valley spring-run Chinook are listed as threatened. Adult and juvenile migratory corridors…. Critical habitat for winter-run chinook includes the San Francisco Bay to the Golden Gate Bridge."	
41.	DF	Biological Resources	399	1	Coho Salmon--Federal Endangered	
42.	DF	Biological Resources	399	30-37	Replace paragraph. "Designated critical habitat for steelhead in Golden Gate National Recreation Area includes the width of the stream channel defined by the ordinary high water line (70FR170 52488)."	
43.	DF	Biological Resources	400-401	37-2	See edits to Marin Section	
44.	DF	Biological Resou	401	2+	Steelhead Trout-Threatened. Adult and juvenile steelhead migratory corridors exist along the San Francisco Bay portion of Golden Gate National Recreation Area lands for two listed	

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<tr><td></td><td></td><td>rces</td><td></td><td></td><td>population segments (California Central Valley and California Central Coast).</td><td></td></tr>
<tr><td>45.</td><td>DF</td><td>MUWO</td><td>404+</td><td></td><td>The sections I read were pretty good and included primary references. However, there is a difference in the level of detail provided in the MUWO section versus for the GOGA. What level is acceptable?</td><td></td></tr>
<tr><td>46.</td><td>DF</td><td>MUWO-Special Status Species</td><td>416-417</td><td>20-11</td><td>Can these paragraphs be removed and replaced with “see prior description on page 399” or something similar</td><td></td></tr>
<tr><td>47.</td><td>DF</td><td>Park management</td><td>498</td><td>9-24</td><td>We have 16FTEs? Do we need the statement of natural resource superlatives?</td><td></td></tr>
<tr><td>48.</td><td>DF</td><td>Special status species</td><td>517</td><td>12-19</td><td>I don’t think candidate species are afforded the same attention as listed and don’t need to be included in the effects determination. I looked at the interagency cooperation language (51 FR 19926) in the Federal register</td><td></td></tr>
<tr><td>49.</td><td>DF</td><td>Special status species</td><td>517</td><td>23</td><td>“…of a federal listed or proposed species…”</td><td></td></tr>
<tr><td>50.</td><td>DF</td><td>Environmental Impacts Common</td><td>528</td><td>14</td><td>Is the park boundaries policy articulated somewhere in the GMP update—I couldn’t find it. It would be helpful to include this if it is not present in the GMP or if it is to reference chapter/section where it is located.</td><td></td></tr>
<tr><td>51.</td><td>DF</td><td>Environmental Impacts Common</td><td>528</td><td></td><td>Natural Resources section. Can there be a policy statement regarding sustainable water resource development and use common to all alternatives? (thinking of Redwood Creek, Corral de Tierra and Stinson watersheds where there is consumptive water use from streams and groundwater within Park)</td><td></td></tr>
<tr><td>52.</td><td>DF</td><td>Environmental Impacts Common</td><td>536-537</td><td>General</td><td>Should there be a statement of shared management? Is there the possibility of NPS helping local state parks with management of their lands? Also, should there be a statement regarding management of GOGA northern lands by PORE into the foreseeable future? Or possible land swap with PORE so that management can be by watersheds?</td><td></td></tr>
<tr><td>53.</td><td>DF</td><td>Alt1 Impacts-Water Resources</td><td>547-552</td><td></td><td>It’s really hard to meaningfully assess water resource impacts between alternatives since there is insufficient details. However, it is hard to believe that the huge list of new/improved recreational developments (p549) would have short-term neglible to minor adverse localized impacts. If there is an increase in hardened surfaces seems like impact would be long-term adverse.

Water resource carrying capacity. There is no information that is easily accessible that speaks to the future number of park users (couldn’t find info in Visitor Use and Experience section). There are finite water resources (both locally and regionally) that are impacted by visitors and park operations alike and there is no analysis of this in this section except on p 550 (lines28-30) but is limited to discussion on increasing water storage.</td><td></td></tr>
<tr><td>54.</td><td>DF</td><td>Impacts-Habitats</td><td>553+</td><td></td><td>Is there any easy metric that can be used for the public to evaluate whether a particular alternative would result in greater or lesser habitats than another? I know that the most informative option (a table of habitat acreages) would be inappropriate that this scale of planning, but can there be some relative scoring of habitat acreage changes normalized to the No Action alternative (++,+, 0, -). Another option would be to have a tabular summary of the number of “projects” associated with each alternative—with the number of projects a proxy for impacts. Here is a partially completed example.
<table>
<tr><th>Metric-GOGA</th><th>No Action</th><th>Alt 1</th><th>Alt 2</th><th>Alt 3</th></tr>
<tr><td>Net increase in trails</td><td>0</td><td>?</td><td></td><td></td></tr>
<tr><td># of wetland restoration projects</td><td>3</td><td>5</td><td></td><td></td></tr>
<tr><td># of terr. restoration projects</td><td>5</td><td>11</td><td></td><td></td></tr>
<tr><td># of new developments</td><td>0</td><td>17</td><td></td><td></td></tr>
</table></td><td></td></tr>
<tr><td>55.</td><td>DF</td><td>Impacts-Habitats</td><td>554-555</td><td></td><td>It’s again hard to evaluate impact of new recreational developments without some understanding of footprint (particularly the “minor” adverse localized impacts determination).</td><td></td></tr>
<tr><td>56.</td><td>DF</td><td>Impacts-CRLF Alt 1</td><td>567</td><td>17-21</td><td>Not clear on how new facilities would be sited to avoid existing or potential frog habitat—it’s also the road corridor system that impacts frogs as well.</td><td></td></tr>
<tr><td>57.</td><td>DF</td><td>Cumulative Impacts</td><td>708</td><td>708-709</td><td>I think that there are several collectively large wq stressors that we could use to compare impacts/benefits of Park actions—Sausalito wastewater treatment discharge, stormwater discharge and overflows-City of SF onto park beaches. Under Habitat (line 19), we could also mention designation of MLPA status for several PORE sites may have regional benefits, but could have long-term potentially adverse impacts in GOGA waters (if fishing pressures increase here).</td><td></td></tr>
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