



May 27, 2014 7:00 AM

RE: Golden Gate National Recreation Area General Management Plan

Dear National Park Superintendent Dean,

We would like to take this opportunity to comment on the National Park Service Golden Gate National Recreation Area General Management Plan (GGNRA GMP). The geographic area we are writing about contains Southern Marin County. We found several issues that were not sufficiently addressed in the GGNRA GMP:

1. The National Park Service (NPS) plans to increase visitor use that will have a significant detrimental affect on wildlife, gateway communities such as Muir Woods Park subdivision, Tamalpais Valley, Tam-Almonte, Homestead Valley, Mill Valley, Sausalito and the ecosystem. Increased visitors directly translate to greater chance of a catastrophic fire. Although a reservation system will take the stress off peak visitor times, projections indicate an increase in the amount of visitors spread over a greater period of time; increased impacts to wildlife and gateway communities.
2. Negative anthropogenic impacts to wildlife's biological functions are well known. Impacts to the 7 ½ square mile Redwood Creek watershed from multiple stressors are already extreme as indicated by the extinction vortex of the salmonids in the system. The NPS is already contributing to violations of Marin County codes, State mandates, the Clean Water Act and Endangered Species Acts through increased and unregulated parking and use and untreated stormwater runoff from roads and parking areas. Toxins and pollutants that are flowing off of the roads during storm run off from cars, such as oil, copper and asbestos laden brake pad dust will be increased from the plan projections. Copper is highly toxic to aquatic species.
3. The Plan's Environmental Impact Study (EIS) section regarding special status species is generally insufficient. The plan concentrates on visitor satisfaction rather than stewardship of natural resources and conflicts with tenets of the public trust. Federal and State protected endangered species of Coho salmon, Red-legged Frogs, Northern Spotted Owls, Tidewater Goby and Threatened Steelhead will be further impacted by the current plans. For this year 2013-2014 only "13" coho came into Redwood Creek. There need to be 272 for a sustainable population according to the National Oceanographic and Atmospheric Administration (NOAA) Fisheries.

The plan does not adequately assess these impacts in the Environmental Impact Study. Nor does the plan include impacts to wildlife from increased anthropogenic influences that will occur should the plans be implemented. The GGNRA GMP extrapolates erroneous baselines expressed as "less than significant" impacts where species populations are critically low and unsustainable. NOAA Fisheries Recovery Plans, already executed, have sustainable population projections not taken into account. Further studies based on federal and state recovery plans are necessary.

4. There is already a water shortage in Muir Beach and Marin County. The proposed utilization of the Banducci site for a "Stewardship Center" for more water and vehicle use, will have an impact on existing water supply for Muir Beach. A 2000 NPS Hydrology Study showed that Muir Beach community was already de-watering lower Redwood Creek, where there are Coho and Steelhead present, by as much as 70- 80%. The NPS Plan is requiring that the mitigation for their taking over of the Banducci site will be increased conservation requirements for the Muir Beach community. While we support Muir Beach conservation to increase summer creek flows, we are concerned about where any water diverted to the tourist population will come from.

5. A new maintenance facility, shared with the Mount Tam State Park projected for Kent Canyon is insufficiently studied for being along a main coho/steelhead tributary of Redwood Creek and where it could impact the Dipsea Trail a national historic registered place and the creek. We are concerned about those impacts.

6. Current and projected parking will continue to be in Critical Habitat Stream Conservation Areas, where the County owned road allows unmitigated toxic stormwater run off to flow directly into the streams containing federally listed coho, red-legged frogs and steelhead.

7. The "Preferred Plan" for the GGNRA GMP will increase Green House Gas Emissions by 7%. This is contradictory to the California State EXECUTIVE ORDER S-21-09 for GHG reductions signed by Governor Brown.

8. Muir Woods National Monument and feeder roads negatively impact local communities and clearly already exceed carrying capacity, even on weekdays. Any increase in use will exacerbate public health and safety issues.

9. Of concern is in the event of a fire, earthquake or other catastrophe. Landslides and/or fire may block the only two roads for egress. The tiny community and Muir Beach Volunteer Fire Department may be the only capable first responders and do not have resources to save thousands of visitors. The plan is putting visitors, communities, the future of Muir Woods National Monument and the environment at greater risk.

Signing of the GGNRA GMP in its current form would be premature, lacking sufficient EIS and gateway communities input and we cannot support recording the document until further, more comprehensive carrying capacity and environmental studies have been conducted. We would like to see policies that protect our natural resources in perpetuity, beyond the needs of a passing tourist to have a "good" experience. We would appreciate your postponing signing this document until we can achieve a better outcome for the relevant stakeholders.

Sincerely,  
Laura Chariton, Director, Watershed Alliance of Marin

CC: Christine Lehnertz, Regional Director NPS  
Congressman Huffman via Jenny Calloway  
Marin County Board of Supervisors – Kate Sears and Steve Kinsey  
Mill Valley City Council Mayor Stephanie Moulton Peters  
Mount Tam Task Force  
California Department of Fish and Wildlife- Gail Seymour Senior Environmental Scientist, Supervisor