

**From:** [Levitt, Howard](#)  
**To:** [Aviles, Brian](#)  
**Cc:** [Frank Dean](#); [Alexandra Picavet](#); [Aaron Roth](#)  
**Subject:** Re: Save Our Recreation comments on the GGNRA general management plan  
**Date:** Tuesday, January 27, 2015 1:06:10 PM

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Brian, your edits are excellent - I'll incorporate all of them, though I will delete reference to the ROD statement. Howard

On Tue, Jan 27, 2015 at 9:15 AM, Aviles, Brian <[brian\\_aviles@nps.gov](mailto:brian_aviles@nps.gov)> wrote:  
I have more in tracked-changes. Attached.

**Brian A. Aviles**

Senior Planner & Landscape Architect  
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On Tue, Jan 27, 2015 at 8:35 AM, Frank Dean <[frank\\_dean@nps.gov](mailto:frank_dean@nps.gov)> wrote:  
Howard,

This is pretty strong, albeit factual. I have just a few tweaks.

Thanks!

Frank

Frank Dean  
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(415) 561-4720

On Jan 23, 2015, at 1:56 PM, "Levitt, Howard" <[howard\\_levitt@nps.gov](mailto:howard_levitt@nps.gov)> wrote:

Frank and Brian: Here is a draft response to Andea Buffa's note. Please let me know what you think. Howard

Andrea:

Thank you again for identifying the specific areas of the GMP you felt needed clarification. We have reviewed all of these specific comments, and offer the following responses. They reflect our view, which we stated at the 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, the GMP reflects a vision in which recreation remains

one of the primary functions of this park, as it has always been. Also, despite your stated concerns, the GMP will not impact the final preferred alternative in the Dog Management Plan. Dog walking is proposed in the Dog Management Plan in areas the GMP describes as both Diverse Opportunity and Natural zones. But in any case, because the Dog Management Plan is a specific site plan, as compared to the GMP, the final preferred alternative from the Dog Management Plan, converted into a federal rule, will be the rule on the ground in the park.

Best,

Howard

### **Guiding Principles – page 7 - 8**

- 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 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.

### **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. "National park experience" very decidedly includes recreation.

### **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 use levels generally described for particular zones, including natural zones, will change significantly over current visitation. Zone use levels are general characterizations; they are not based on visitor counts.

### **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.

#### **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.

#### **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 - page 282. These strategies will be developed and employed if and when compelling circumstances arise.

#### **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 and in this note, only the Dog Management Plan, as a specific activity plan, will determine the specific areas in which dog walking can occur.

On Thu, Jan 22, 2015 at 8:35 PM, Andrea Buffa

<(b)(6)> wrote:

Hi Frank and all,

I'm writing to check in about when we might hear back from you about how you plan to address our suggestions about the GGNRA general management plan. I'd be happy to meet with someone on your staff to go through our feedback. I'd also like to discuss the questions we submitted about the development of the plan. I think another meeting would be beneficial so that Save Our Recreation thoroughly understands how the sections of the plan we've inquired about were developed and what the rationale is for the changes in the general management plan.

Thanks for your consideration, and I look forward to hearing from you.

All the best,

Andrea Buffa

On Thu, Jan 15, 2015 at 8:12 AM, Frank Dean <[frank\\_dean@nps.gov](mailto:frank_dean@nps.gov)> wrote:

Hi Andrea,

Just wanted to thank you for your feedback on this. We are reviewing your comments.

Frank

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[\(415\) 561-4720](tel:(415)561-4720)

On Jan 13, 2015, at 2:29 PM, Andrea Buffa  
(b)(6) > wrote:

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.

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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

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