

From: (b)(6)
To: [Christine Lehnertz](#)
Cc: karen_washington@nps.gov; jon_jarvis@nps.gov
Subject: The General Management Plan
Date: Tuesday, May 27, 2014 11:17:08 AM
Attachments: [pastedGraphic.tiff](#)

Dear Ms. Lehnertz,

I am writing as a follow-up to my phone call, to express grave concerns over the GGNRA's General Management Plan FEIS. I am urgently requesting to delay the signing of the decision of record, as the document's foundation and potential consequences should call for critical reevaluation. I am requesting that the NPS issue a Supplemental EIS, and allow for a wider discussion that generates far more outreach and public input.

Among the issues:

The GMP represents a troubling and radical departure from the enabling legislation for the GGNRA, and the changes are being moved forward with a process that only received several hundred public comments that were deemed substantive. Additionally, the concerns of stakeholders and gateway communities have not been adequately considered and addressed to allow for the signing of the GMP to take place.

Specifically:

- In what appears to be an end-run around the enabling legislation for the Golden Gate National Recreation Area, the newly released General Management Plan uses the NPS's internal planning process to literally redefine the set-aside land's established purpose. The original language that once held, "preserving for public use and enjoyment.... to provide for the maintenance of needed recreational open space...", is now changed to "...providing a national park experience...". One would think it would take a new act of Congress to change a law that established the GGNRA's purpose, and the National Park Service's responsibility to maintain it consistent with that purpose. And we know from attempts in 2008 (HR 6305), that any such congressional action was highly controversial and thus abandoned. For more than four decades, the Golden Gate National Recreation Area has had the same name and purpose that was assigned to it by Congress in 1972.
- The GGNRA asserts that this plan was the product of a broad and vast public process, involving "thousands of Bay Area residents" over "close to a decade". The facts show otherwise. The plan received a total of 561 substantive comments made during a single 4 month long public comment period. The GGNRA boasts 17 million visitors annually but could only generate 561 comments for the overarching management strategy for the next 20 years. This cannot be considered a legitimate referendum on something that so profoundly impacts public lands, and it represents a huge failure by the NPS to adequately inform and engage the public on the GMP. Just for contrast, the two rounds of comments for the Dog Management Plan received upwards of 10,000 comments. Concern over those comments actually being *considered* is another matter entirely and the topic of another letter. But the sheer anemic public response for the hugely important GMP is a giant red flag.
- The new plan seeks to attract and accommodate growing visitation to monetized destinations like Muir Woods, while removing people (starting with people with dogs) from more remote

portions of the GGNRA that require management but don't generate revenue. 90% of Marin's GGNRA land will be re-classified as a "natural zone" where access will be "restricted" to many so that a few might have the opportunity to experience "solitude" in an urban park that is shared and surrounded by millions of people. Recreational access is being slashed, and the diverse public who need this outdoor space the most are going to be denied it.

- The plan describes future "enhancements" such as parking lots, transit connections, overlooks, restrooms and interpretive exhibits planned for the Four Corners/Panoramic Highway area above Muir Woods, as well as Santos Meadow in Frank Valley. The public was assured in numerous formats and venues, that such plans were "off the table", but they are in the GMP, in repackaged and vague terms. GGNRA Superintendent Frank Dean hasn't acknowledged publicly that he is in possession of two stiffly worded letters, from Congressman Jared Huffman and Marin County Board of Supervisors President Kate Sears, urging him in the strongest possible terms, to remove all language hinting at this sort of development from the GMP before it is signed later this month. So far, we've seen no such change...and the full court press and spin by the GGNRA seems to indicate that none is coming.

- The GMP identifies the Golden Gate National Parks Conservancy as the primary "park partner". And the GGNRA's public position appears to be if you want to help the parks, give to the Conservancy. I hope the GGNRA will also consider the taxpayer an equally important partner--even those who cannot afford to give to the GGNRA's favorite non-profit. While the Conservancy money is tempting, those dollars diminish real park budgets over time, and allow the National Park Service to abdicate its responsibility to properly manage and maintain the Area as Congress tasked them with. The voice and roll of the taxpayer are dwarfed by the deep pockets and priorities of the Conservancy. The public doesn't need more parking lots, fences, visitor centers and interpretive signs. The people of the densely populated Bay Area need access to their public land, and a National Park Service that upholds the enabling legislation that promised that access and provided for the maintenance of the GGNRA.

Please delay the signing of this important document that is the GMP. It requires a Supplemental EIS, to consider the input of the wider public that has not been achieved so far. We would appreciate the opportunity to meet with you as soon as possible to discuss these issues that are of great concern to citizens, and should be of great concern to the National Park Service.

Thank you so much,

Laura Pandapas, Marin County Resident

In association with Defense of Place—Collaborating nationwide to protect parks and open space from sale, development and predatory changes in use.

Laura Lovitt Pandapas

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