



## Categorical Exclusion Approval & Decision to Implement

**Project Name:** Pacific Leadership Institute Overnight Program, West Fort Miley, Lands End

**PEPC Project Number:** 65492

**Project Record Location:** GGNRA Environmental Compliance Office, Fort Mason, Bldg 101 S.F. 94123

**Proposal Description:** See Attachment A

**Introduction:** This memorandum with attachments, and the information in the project record, documents and completes the National Environmental Policy Act (NEPA) review and requirements for implementing the Pacific Leadership Institute Overnight Program proposal.

**Categorical Exclusion:** On the basis of the impact assessment in Attachment A, park interdisciplinary review, public review and comment, and the information in the project record, this project is Categorical Excluded (CE) from further NEPA analysis in accordance with DO-12, Section 3.3:

A.5 Issuances, extensions, renewals, reissuances, or minor modifications of concession contracts or permits not entailing new construction.

Additional supporting information for this determination is in the following attachments and the decision file:

- Attachment A: Pacific Leadership Institute Overnight Program, West Fort Miley, Lands End
  - Project Information; Background; Purpose, Need, and Objectives; Development of Proposal; Actions to be Implemented; Impact Assessment; National Historic Preservation Act (NHPA) Section 106 Compliance; Summary of Public Comments; Decision/Implementation Process
- Attachment B: Map and Site Plan
- Attachment C: Letter of NHPA Section 106 Compliance Completion and Assessment of Actions Having an Effect on Historic Properties
- Attachment D: Public Review and Comment Summary

**Final Agency Decision:** The Final Agency Action is described in Attachment A, Section E "Actions to be Implemented".

**CE Approval and Decision to Implement:** On the basis of my review of the environmental impact analysis, public comment, and all information in this compliance file, I am categorically excluding the Project from further NEPA analysis. No exceptional circumstances or conditions in Section 3.5 of Director's Order 12 apply. I approve this action to be implemented.

Cicely Muldoon, Acting General Superintendent  
Golden Gate National Recreation Area

12 SEPTEMBER 2017

Date

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National Park Service  
U.S. Department of the Interior

Golden Gate National Recreation Area  
Date: 09/08/2017

## ATTACHMENT A

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### **Pacific Leadership Institute Overnight Program, West Fort Miley, Lands End**

**(Project Information; Background; Purpose, Need, and Objectives;  
Development of Proposal; Actions to be Implemented; Impact  
Assessment; National Historic Preservation Act (NHPA) Section 106  
Compliance; Summary and Response to Public Comments;  
Decision/Implementation Process)**

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## ATTACHMENT A

### Pacific Leadership Institute Overnight Program, West Fort Miley, Lands End

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#### A. PROJECT INFORMATION

Park Name:	Golden Gate National Recreation Area
Project Title:	Pacific Leadership Institute Overnight Program
PEPC Number:	65492
Project Location:	West Fort Miley
County, State:	San Francisco County, California
Administrative Record Location:	Fort Mason, Bldg 201; San Francisco, CA 94123

#### B. BACKGROUND

The Pacific Leadership Institute (PLI) is a local organization focusing on outdoor/adventure education, team building, personal and professional development, and youth leadership training. The Fort Miley Adventure Challenge Course (FMACC) was built in 1979 within the Golden Gate National Recreation Area (GGNRA). In 1998 FMACC became a program of the Pacific Leadership Institute, housed in the Department of Recreation, Parks, and Tourism Department at San Francisco State University (SFSU), and administered through the 501(c)(3) arm of SFSU called the University Corporation (UCORP). The PLI currently delivers over 350 programs each year serving more than 10,000 participants with demand continuing to grow. Currently PLI operates under a long-term Special Use Permit (SUP); the permit is renewed annually and the current permit expires December 1, 2017.

PLI's partnership directly supports and is aligned with GGNRA's mission *"to preserve and enhance the natural, historic and scenic resources... for the education, recreation and inspiration of people today and in the future. In the spirit of bringing national parks to the people... reach out to a diverse urban community, promote the richness and breadth of the national park system to many who are experiencing a national park for the first time."* A

diverse and urban community of youth are the PLI's target population, and the ropes course serves as a gateway to the national parks for traditionally underserved visitors. The ropes course has been operating in partnership with GGNRA for over 35 years and has demonstrated the ability to lead successful programs onsite with minimal neighborhood disruption.

The proposed pilot overnight program will inform planning for a possible future expansion which would enable the PLI to better fulfill their mission to create a pathway from outdoor adventures to college access and to meaningful employment and career opportunities. PLI is proposing to unfold this expansion in three phases over the next five years by developing an



additional low element circuit course, one large group camp site, and a second universally accessible ropes course and zip line center to the hillside at West Fort Miley. The action currently under consideration for approval is only comprised of the temporary pilot overnight program at West Fort Miley, the result of which would inform future planning efforts for the conceptual three phase expansion. Should NPS and PLI be interested in pursuing additional program expansion, those plans will be subject to additional environmental review.

### **C. PURPOSE, NEED and OBJECTIVES**

#### **Purpose and Need:**

The FMACC ropes course has changed little since its inception and it is time to expand. This pilot program offering overnight programming is a beginning step for PLI in exploring the feasibility of future campus expansions and further fulfilling its mission potential.

The PLI now seeks to leverage and build off of existing successful programs at West Fort Miley in order to achieve new growth in both numbers served and outcomes desired. This pilot program will help accomplish the following: meet the demand for programs, increase impact on participants, enhance partnerships, and better serve urban youth in learning outdoor leadership as a means to empower and improve lives and communities.

PLI seeks to diversify current program offerings by piloting an overnight camping program on the upper lawn at West Fort Miley. With high demand for PLI's programs, this new option will allow PLI to reach new youth populations and deepen the experiences for those already being served.

PLI is well positioned to pilot a small group campsite on the upper lawn area at West Fort Miley. This site was chosen because of its proximity to the ropes course, the minimal infrastructure requirements needed to support temporary camping, and the ability for the pilot program to accurately inform the future conceptual three phase expansion. PLI will partner with groups they already serve to offer a one or two night stay in conjunction with other PLI programs, including the ropes course. These overnight opportunities will create more meaningful outdoor experiences and add value to PLI's goal of changing lives through adventure. To initiate this program, PLI will need to address bathrooms, potable water supply, park amenities (e.g., picnic tables, portable fire pit), and security.

#### **Objectives:**

A successful project would:

- Better meet the demand for programs.
- Increase positive, lasting outcomes for participants.
- Enhance partnerships.
- Better serve urban youth in learning outdoor leadership as a means to empower and improve lives and communities.
- Inform the possible establishment of group camping facilities at West Fort Miley, consistent with the goals of the 2014 General Management Plan<sup>1</sup> (Vol. I, Pg. 132).

## D. DEVELOPMENT OF PROPOSAL (PRE-PROPOSAL SCOPING)

As a long-standing park partner, PLI initially approached the NPS Golden Gate National Recreation Area’s (GGNRA) Business Management Division (BMD) with an expansion proposal for their current programming and site. BMD convened an interdisciplinary team comprised of park staff subject matter experts to begin internal scoping and discussion of the proposed overall campus expansion in February 2016. The team included the GGNRA Interpretation and Education Division staff to discuss plans and needs for additional camping within the park, and consultation with an arborist to discuss the health and longevity of the Lands End forest. The expansion concept was brought to the park’s Leadership Team for scoping and received initial support, thus BMD continued to work with PLI to refine the proposal.

PLI presented this refined proposal at a National Environmental Policy Act (NEPA) Project Review /National Historic Preservation Act (NHPA) 5X Committee Meeting on October 26, 2016. Following the meeting the proposal was certified for NHPA Section 106 as No Adverse Effect with stipulations (see Attachment C). For NEPA concerns the Executive Committee was supportive of PLI’s efforts to expand their programming to offer overnight programs at West Fort Miley, however, project approval is contingent upon PLI addressing a set of recommendations. Foremost of the recommendations is that the project obtain review and comment from interested and affected public and stakeholders. A draft document outlining the proposed action and impact analysis was provided to the public for a 30-day review and comment period (see Section H “Summary and Response to Public Comments” for more detail).

Neighborhood residents, which have been identified as key stakeholders, have a formal neighborhood meeting on a regular basis. Representatives from NPS and PLI attended March 2017 community meetings to provide information about the proposal, receive feedback, and advise neighbors on how to provide comments.

## E. ACTIONS TO BE IMPLEMENTED

PLI will create and run a pilot program from a temporary small group campsite that would accommodate up to 30 campers on the upper lawn area at West Fort Miley. Located on the southern edge of this lawn, they will develop a temporary small group campsite with



<sup>1</sup> National Park Service. (2014). *Golden Gate National Recreation Area Muir Woods National Monument Final General Management Plan/Environmental Impact Statement*. Retrieved from [https://www.nps.gov/goga/learn/management/upload/GOGA\\_FGMP\\_Volume\\_I-3.pdf](https://www.nps.gov/goga/learn/management/upload/GOGA_FGMP_Volume_I-3.pdf)

tent area, kitchen/meal prep area, additional picnic tables, a portable fire pit, and sitting area (e.g., circle of logs). The pilot program at West Fort Miley, which would not exceed two years of operation, would serve:

- PLI-specific groups only
- 15-30 campers per trip in two or four person tents
- 25-35 groups per year
- One or two nights per group

The program will adhere to the following standards:

- All equipment will be packed-in at the start of each overnight session and packed-out at the end.
- The public will have free access to areas not designated for use by PLI; subject to existing opening and closing times.
- Mandatory quiet hours, from 9:30 pm to 6:30 am.
- Light pollution guidelines consistent with NPS Night Skies best management practices (BMPs), including lights out and fires out by 9:30 pm.

The July 2016 event, Packing the Parks, set a precedent for single-night pack in, pack out camping managed by a park partner at West Fort Miley. At that event, tents were set up on the grass, food was prepared and cooked on the concrete apron of Battery Chester, and portable bathrooms were placed next to the bunker. Feedback from event organizers stated that, "It all fit and worked well." Security measures taken at the event included notifying United States Park Police (USPP) and ensuring continual staff presence with radio connection to USPP dispatch. PLI will operate this pilot overnight program in a similar manner.

The pilot will be authorized under a two-year Special Use Permit (SUP). As the authorizing agency which will allow the pilot camping, the NPS will impose the following requirements on PLI:

- To reduce potential conflicts and impacts associated with exclusive use, PLI will ensure participants of the "Community Open Days" at the ropes course, which are open to public not affiliated with any particular group, are given the opportunity to learn about and engage with the proposed pilot overnight program.
- PLI will ensure that all participants within the pilot phase of this overnight program will be from educational groups, and not corporate entities.
- To allow evening visitors to enjoy the night views looking south along Ocean Beach, PLI will ensure placement of tents does not hinder public access to the overlook.
- To minimize noise and visibility to neighbors, tents will be placed adjacent to the trees along southern edge of lawn such that they are not visible from the houses, and will help dampen sound.
- To reduce impact to local soundscapes, PLI will ensure all sound/noise associated with the overnight program remains under 65dB, measured on the A-weighted scale, at 50' (per requirements in 36CFR§2.12). PLI will strictly monitor sound for the first four overnight programs, and once per month thereafter.
- To minimize the impression of camping as a regularly authorized activity, PLI will ensure all equipment and physical program elements are removed from publicly accessible pilot overnight program areas during the time between two hours after sunrise and two hours before sunset.
- PLI will maintain the camping area before, during, and after program participants are present, and will pack in and pack out all equipment, food, and trash related to the overnight program.
- To inform the public of the nature of the programming occurring at West Fort Miley, PLI will post a

temporary sign (such as an A-frame or Windmaster) when camping equipment is present.

- To help curb vandalism and other illegal activities in the area unarmed private security will be required and USPP will be made aware of all scheduled camping nights.
- To avoid potential adverse impacts and conflicts with wildlife and to increase sustainability, PLI will develop and submit to NPS a Waste Management Plan.
- PLI will provide cost recovery to NPS for any actions taken by NPS necessary to support programming or to repair programming impacts, including site improvements, additional turf maintenance, waste management, waste water disposal, and additional security or enforcement activities.
- PLI will be furnished with six overnight parking passes which PLI may furnish to program participants, including a designation of area(s) overnight program participant parking may be confined to.
- To avoid potential conflict with other scheduled, permitted events at West Fort Miley, PLI will notify the GGNRA Office of Special Park Uses of all expected program dates.
- PLI will ensure continued coordination and communication with the adjacent San Francisco Veterans Affairs Health Care System (SFVAHCS) facility, notifying them of all expected program dates, and ensuring that no participants park on SFVAHCS property.
- To avoid potential exposure to asbestos containing materials, PLI will ensure that the Battery Chester gun pit, which is adjacent to the West Fort Miley lawn area, is off limits during any programming. PLI will ensure that on-site program leads understand this and communicate with all participants.
- PLI will continue to participate in annual meetings with BMD, and prepare for inclusion in those meetings annual summary reports detailing program outcomes, successes, opportunities, and any planned changes.
- NPS encourages ongoing communication between interested and affected parties and PLI, and with NPS through existing methods and channels. BMD will review complaints and communications related to this pilot program and facilitate ongoing stakeholder engagement as relevant and appropriate.
- PLI will ensure any campfires are limited to a single portable fire pit, and will occur only under the conditions designated by the Superintendent's Compendium, Section 2.13 "Fires".



*“Packing the Parks” Program Participants at West Fort Miley, July 2016*

## **F. IMPACT ASSESSMENT**

The following section describes the impacts of the actions to be implemented by PLI. In summary, the NPS has preliminarily determined the actions proposed herein will not have the potential to cause significant adverse impacts, will not trigger any DO-12 §3.5 Exceptions, and will meet the requirements of a Categorical Exclusion

(DO-12 §3.3) under NPS NEPA guidelines.

**Existing Conditions**

The West Fort Miley picnic area is available to be reserved for weddings, picnics, and other special use permits (SUP). On average, less than one event per month receives an SUP for this site. SUPs are only offered during daytime hours (from sunrise to sunset) generally 8:00 am to 5:00 pm. Occasional use by visitors without the need for a SUP occurs, and higher usage occurs on weekends. This site is used mostly by local neighbors and attracts few visitors from outside the neighborhood or adjacent Veterans Affairs facility. The general area sees a higher amount of vandalism and homelessness than is the average in GGNRA. There is an existing portable toilet nearby, and the road is accessible from the VA or the USSSF Memorial Parking Lot (key required).

**NPS Screening Form (ESF)**

The NPS uses an Environmental Screening Form (ESF) to record preliminary evaluations of a screening level impact assessment to identify environmental impacts that may require an Environmental Assessment (EA) or Environmental Impact Statement (EIS).

*Resource Impacts to Consider:*

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Air</b> Air Quality <i>Local Air Quality</i>	Potential	Issue: Operation of a recreational fire, as will occur only under the conditions designated by the Superintendent’s Compendium, Section 2.13 “Fires”.  Impact: A small temporary increase in wood smoke from a single fire, and associated particulate matter in the immediate area. Fires will not be permitted on “Spare the Air” days or when fire danger is high, very high, or extreme.
<b>Biological</b> Nonnative or Exotic Species	None	N/A
<b>Biological</b> Species of Special Concern or Their Habitat	None	N/A
<b>Biological</b> Vegetation <i>Mature, unmanaged tree grove to the south</i>	Potential	Issue: Some pruning and management of trees to mitigate potential hazards may be required.  Impact: Pruning or tree removal actions associated with hazard tree management will be limited to trees which pose an imminent danger to visitors or immediate threat to park resources, and will not treat more than individual plants or more than one specimen of a species (or, at most, a small isolated grouping of individuals). All hazard tree management will be done in compliance with Pacific West Region Directive: PW-062 “Hazard Tree Management”, and will not have the potential to significantly impact the health or viability of the forest.

Resource	Potential for Impact	Potential Issues & Impacts
<b>Biological</b> Vegetation <i>Local, native vegetation</i>	Potential	<p>Issue: Program participants trampling vegetation, and/or introducing additional sanitation issues.</p> <p>Impact: Additional sanitation issues are unlikely with the implementation of the SUP conditions, including the requirements that PLI pack in and pack out all trash, food, etc., create and implement a Waste Management Plan, and bring a portable toilet on site during programming. Vegetation trampling is also unlikely, as all locations within the pilot program will be on high use, developed areas (i.e. asphalt, pavement, and lawn) and PLI will not be permitted to use any trails beyond the existing network of publicly accessible trails already in use. Further, impacts to native vegetation are unlikely as most vegetation in the area is non-native, and the site primarily consists of asphalt, pavement, and lawn surrounded by non-native trees.</p>
<b>Biological</b> Wildlife and/or Wildlife Habitat including terrestrial and aquatic species <i>Local wildlife, including hawks and bats</i>	Potential	<p>Issue: Program activities and/or participants impacting local wildlife, specifically hawks and bats.</p> <p>Impact: The proposed programming will not require removal or disturbance of trees or other vegetation over 18 inches in height, and is therefore unlikely to affect hawks or other native birds. PLI is aware of the sensitivities of local migratory birds, and has worked diligently with NPS Wildlife Ecologists in the past to ensure programming and other activities do not disturb nesting raptors. Impacts to bats in the area would be negligible. The limited night lighting associated with the pilot program may attract insects that bats feed on during periods when the lights are on. While this could change the bats foraging behavior, it would not necessarily cause an adverse impact. It is unlikely any impacts from camping lanterns and flashlights associated with the pilot program on bats could be quantified.</p>
<b>Cultural</b> Archeological Resources <i>Potential Buried Archeological Artifacts</i>	Potential	<p>Issue: Ground disturbance from equipment staking.</p> <p>Impact: No tent or equipment staking will be permitted per SUP conditions, and no other ground disturbance is proposed.</p>
<b>Cultural</b> Cultural Landscapes <i>West Fort Miley</i>	Potential	<p>Issue: Location of camping is on the northwest section of the lawn adjacent to West Fort Miley</p> <p>Impact: No permanent impact. No visual impact between two hours after sunrise and two hours prior to sunset. An increased use of the area may decrease vandalism of the fort.</p>
<b>Cultural</b> Ethnographic Resources	None	N/A
<b>Cultural</b> Museum Collections	None	N/A

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Cultural</b> Prehistoric/historic structures <i>Battery Chester</i>	Potential	Issue: Additional adaptive reuse of Battery Chester and surrounding area.  Impact: No disturbance of historic fabric, or damage to the structure will occur from the proposed uses. Additional activation of the space and facility may decrease vandalism.
<b>Geological</b> Geologic Features	None	N/A
<b>Geological</b> Geologic Processes	None	N/A
<b>Lightscares</b> Lightscares <i>Night Skies</i>	Potential	Issue: Post-sunset camping could create temporary increase in lighting associated with area safety lighting, headlamps/flashlights, and temporary fire rings.  Impact: Slight increase in lighting in the immediate area prior to designated lights out time of 9:30 pm. Note, this location is adjacent to the heavily illuminated Veterans Affairs facility and a residential neighborhood with street lighting.
<b>Other</b> Human Health and Safety <i>Visitor, employee safety</i>	Potential	Issue: Antisocial behavior and illegal activities present at times due to low usage of site.  Impact: Further activation of the site, including an increase in programming with on-site security is expected create a safer visit for local residents, visitors, and program participants. A decrease in vandalism is also expected. See subsection G.3 “Issues and Concerns” below for additional detail and analysis.
<b>Other</b> Human Health and Safety <i>Hazard Trees</i>	Potential	Issue: Existing hazard trees and potential development of tree hazards in the future.  Impact: Hazard tree management will reduce potential safety hazards and result in a safer situation for program participants, staff, and other park visitors to the site.
<b>Socioeconomic</b> Land Use <i>Type of Use</i>	Potential	Issue: New recreational use type introduced at West Fort Miley.  Impact: The lawn adjacent to West Fort Miley will be used temporarily for this overnight program. Currently this area is occasionally used for special events, but the specific area where camping will occur has less views of the ocean and will receive an increase in activation. A majority of the campers will be from under-served audiences who visit the PLI Ropes Course prior to camping. This is expected to be the first camping experience for many urban youth who reside in the city.

Resource	Potential for Impact	Potential Issues & Impacts
<p><b>Socioeconomic</b> Minority and low-income populations, size, migration patterns, etc. <i>Minority and low-income populations</i></p>	Potential	<p>Issue: Increase in diverse populations which visit and use this location.</p> <p>Impact: Current participants of the PLI Ropes Course are: 28% Asian, 24% White, 20% Latino, 14% African American, 4% Pacific Islander, 2% Native American &amp; 8% Other/No Response. Camping participants will participate in the Ropes Course during the day, and therefore be similarly diverse. This will result in an increase in diversity of populations which visit and use the West Fort Miley lawn and picnic area.</p>
<p><b>Socioeconomic</b> Socioeconomic <i>Employment Opportunities</i></p>	Potential	<p>Issue: Opportunity for local employment and job skills development/training.</p> <p>Impact: A temporary expansion of programming to support the proposed pilot program may provide additional job opportunities. A successful pilot may lead to further long-term expansion of PLI programming. PLI has an active workforce development program that hires ropes course facilitators whom were first introduced as participants. These previous participants turned staff have the opportunity to gain more training and experience, and find further opportunities within PLI and similar organizations.</p>
<p><b>Socioeconomic</b> Socioeconomic <i>Home Values</i></p>	Potential	<p>Issue: Impacts from temporary overnight programming affecting nearby home values.</p> <p>Impact: NPS does not believe this temporary pilot program will affect home values.</p>
<p><b>Soundscapes</b> Soundscapes <i>Local Soundscape</i></p>	Potential	<p>Issue: Sounds and noise from the overnight programming traveling within the immediate local area.</p> <p>Impact: There may be a small increase of sound around sunset and sunrise, but in accordance with Director's Order 47: Soundscape Preservation and Noise Management (DO47), 65dB, measured on the A-weighted scale, at 50' (per requirements in 36CFR§2.12) will be the maximum allowed. The location is tucked in a corner of the lawn with a grove of trees and approximately 100 yards separating the location from a residential area. Quiet hours will be strictly enforced, and PLI will manage participants very tightly. With security and a high ratio of adults to youth, a close eye would be placed on activities. PLI will strictly monitor sound for the first four overnight programs, and once per month thereafter.</p>

<b>Resource</b>	<b>Potential for Impact</b>	<b>Potential Issues &amp; Impacts</b>
<b>Visitor Use and Experience</b> Recreation Resources <i>Available Activities and Supply</i>	Potential	Issue: Increased recreational offerings for PLI participants, and availability of the area for continued public use and special use permits.  Impact: Special Use Permits are issued at West Fort Miley for special events such as picnics and weddings. There was an average attendance of 66 persons per event, and an average of just over 15 events per year, or 1.5 events per month, virtually all events happening on the weekend, and all occurring during daylight. These events will continue to be allowed, and are not expected to conflict with the PLI pilot overnight programs. PLI will increase the recreational programming available to participants by having two or three camping trips per month (one or two night duration per trip) during the two-year pilot. See subsection G.3 “Issues and Concerns” below for additional detail and analysis.
<b>Visitor Use and Experience</b> Visitor Use and Experience <i>West Fort Miley</i>	Potential	Issue: Change in amount of visitor use and experience.  Impact: PLI will have on site security during all overnight programming, and visitor experience is expected to improve with increased activation of the area. Daytime visitor use will be minimally impacted as described in the prior impact topic.
<b>Water</b> Floodplains	None	N/A
<b>Water</b> Marine or Estuarine Resources	None	N/A
<b>Water</b> Water Quality or Quantity	None	N/A
<b>Water</b> Wetlands	None	N/A
<b>Wilderness</b> Wilderness	None	N/A

*Park Specific ESF Addendum Questions:*

<b>Question</b>	<b>Answer</b>	<b>Notes</b>
<b>Adversely affect historic fabric, vegetation, terrain or setting?</b>	No	As part of the pilot review, vegetation will be monitored. Any damage will be repaired.
<b>Change historic ground cover or vegetation?</b>	No	N/A

<b>Question</b>	<b>Answer</b>	<b>Notes</b>
<b>Introduce non-historic elements (visible, audible or atmospheric) into a historic setting, structure or environment?</b>	Yes	Camping is a non-historic use for the area, but the NPS has explored the possibility of providing public camping in the area in the past. All equipment associated with the overnight program will be removed within two hours after sunrise and not be placed on site prior to two hours before sunset.
<b>Reintroduce historic elements in a historic setting or environment?</b>	No	N/A
<b>Are there any archaeological resources in the project area?</b>	No	N/A
<b>Maintain, create or change a public or employee safety or health hazard?</b>	Yes	An increase in visitation to West Fort Miley is expected to result in a reduction of illegal activities in the area, and increase public and employee safety. PLI will have security on site during all overnight programs. See subsection G.3 “Issues and Concerns” below for additional detail and analysis.
<b>Compromise slope stability?</b>	No	N/A
<b>Change the pattern of surface water flow, alter hydrologic processes or affect erosion?</b>	No	The overnight program will not introduce any new structures or changes in landscaping. The proposed activities are not expected to result in increased erosion, or create conditions that might affect surface water flow or alter hydrologic processes.
<b>If there is ground disturbance, is it greater than one acre?</b>	No	N/A
<b>Affect park trails or trail usage?</b>	No	N/A
<b>Affect current or planned visitor services, recreation resources, access or available parking?</b>	Yes	The proposal will provide additional recreational opportunity for PLI program participants, but may slightly reduce the access to the West Fort Miley area for the general public during the hours between two hours before sunset and two hours after sunrise during overnight programs in this pilot time frame. Limited additional overnight parking for program participants may also result during the pilot program. See subsection G.3 “Issues and Concerns” below for additional detail and analysis.
<b>Change congestion levels, traffic volumes or traffic safety conditions for vehicles, pedestrians or bicyclists?</b>	No	N/A

<b>Question</b>	<b>Answer</b>	<b>Notes</b>
<b>Change or impede accessibility?</b>	No	PLI's existing programming serves a number of populations with accessibility needs, has accessible features, and provides reasonable accommodations. The proposed pilot camping area was in part chosen due to its accessibility.
<b>Change the demand for police or emergency services or create an attractive nuisance?</b>	Yes	It is possible a negligible increase in demand for emergency services may occur. Emergency services are unlikely to be related to the participants, but most likely would be related to an increase in eyes on the ground in the area to report illegal activities.
<b>Changes dark conditions, natural night skies or glare?</b>	Yes	Lighting will be regulated according the SUP, and any effects will be temporary and will not last throughout the night.
<b>Alter scenic features, viewsheds, be visually intrusive or add to a degraded visual condition?</b>	Yes	The scenic view from West Fort Miley may be marginally impacted, but would only occur between two hours prior to sunset to two hours after sunrise.
<b>Involve handling/storage of hazardous substances or work in areas of possible contamination?</b>	No	The proposed area has been sampled for hazardous materials. The Battery Chester lawn area can be used as a temporary camping area, however, the tar like material covering the gun pit has been reported as containing 2% asbestos fibers. Because of this, the gun pit will be off limits. PLI will ensure that program leads understand this and communicate with all participants regarding this exclusion zone.
<b>Change the level of emissions from vehicles or increase other air pollutants?</b>	Yes	A portable, temporary fire pit will be used when park regulations allow, and a resultant minimal local increase in particulate air pollution is possible.
<b>Change the amount of resource use (water, fuel) or waste generated?</b>	No	Potable water is not currently accessible at the site. PLI will pack in all water needs initially, and may work with NPS Maintenance to install a locked hose bib at the site if warranted. Any increase in water usage would be negligible.
<b>Involve issues of concern for park neighbors or organizations or generate media attention?</b>	Yes	Local park neighbors may express concern over the proposed temporary and limited change in use. Neighborhood and stakeholder groups the NPS has met with have expressed their support for the program. NPS has a long and successful history with PLI and is confident the pilot program will be well managed and respectfully operated adhering to all proposed conditions.
<b>Affect long-term management of resources?</b>	No	N/A
<b>Set a precedent within GGNRA?</b>	No	Public camping under reservation is allowed in other areas of GGNRA. This program is explicitly proposed as a limited term pilot to inform future decision making, and does not represent an approval of long-term change of use.

Question	Answer	Notes
<b>Will the proposed action(s) require removing, changing, relocating, replacing, and/or adding signs?</b>	Yes	Temporary signs identifying the programming as a permitted PLI activity will be allowed while programs are in operation. Signs will be removed after each overnight.

**Issues and Concerns**

*Public Access and Visitor Experience*

Existing Conditions: The area is open to the public for day-use activities only, and the picnic area and associated amenities (grills, tables) may be reserved through a special use permit.

Conditions with Project: Public access to a portion of the West Fort Miley site will be limited from two hours before sunset to two hours after sunrise for between two to six nights per month, when PLI runs an overnight program. Furthermore, PLI will limit camping activities to the southern quadrant of the lawn, which will continue to provide space for other public use during those times. Otherwise no access will be changed, the public will continue to have full day use access, and will continue to be able to reserve the day use amenities through a special use permit.

*Restricted Use Camping*

Existing Conditions: There is no authorized camping at West Fort Miley.

Conditions with Project: For the temporary term of the proposed pilot, PLI will be allowed sole use of the West Fort Miley area for providing camping for their program participants under the conditions outlined in Section E. “Actions to be Implemented”. The public will not be allowed to camp in the area. The public may camp in the restricted area by participating in a returning group which is first registered and planned with PLI.

*Traffic and Parking*

Existing Conditions: There is a service road to the site, which is not open to public vehicles. Parking lots are located at either end of the service road. See Attachment B, “Map and Proposed Site Plan”.

Conditions with Project: PLI will be allowed to drive a vehicle to the site for loading and unloading. The USS San Francisco Memorial parking lot may be used for overnight parking by program participants. There are no other overnight uses in the area which will be impacted by this temporary use. There are also two close additional parking lots located at Lands End Lookout and Sutro Heights Park which could be used by visitors or program participants in the event the Memorial lot is full.

*Public Safety*

Existing Condition: The area has homeless encampments and other illegal activities occurring there now, which can result in unsafe conditions for visitors.

Condition with Project: The NPS expects that more active use of the area will help deter illegal uses and activities in the area. PLI is part of San Francisco State University, which takes security of their staff and participants very seriously, and are working on a security plan for the pilot overnight program. The currently intermittent homeless in the area are part of a larger city wide problem. GGNRA is working on a closer relationship with the city on this issue as there are other park locations that have similar issues. Security will be required for the pilot overnight program.

### *Park Operations and Sustainability*

Existing Conditions: This area is maintained by NPS. Garbage collection occurs daily, grass is mowed regularly, and graffiti is regularly cleaned or painted over by NPS staff.

Conditions with Project: NPS will continue all existing maintenance operations with no change in schedule. PLI will maintain the camping area before, during, and after program participants are present. PLI will pack in and pack out all equipment, food, and trash that does not fit in trash receptacles, related to the overnight program.

## **G. NATIONAL HISTORIC PRESERVATION ACT (NHPA) SECTION 106 COMPLIANCE**

During internal scoping at a NEPA Project Review/NHPA 5X Committee Meeting on October 26, 2016 Golden Gate National Recreation Area's Cultural Resource Assessment Team reviewed the proposal under Section 106 of the National Historic Preservation Act. Following the meeting the proposal was certified for NHPA Section 106 as No Adverse Effect with stipulations.

For the actions to be within compliance requirements during implementation, the following cultural resource stipulations will be adhered to:

- Project Manager will document before and after site condition photos for comparative purposes.
- Project Manager will include the park's Historical Landscape Architect in the annual Business Management Division review of the pilot camping program site condition evaluation.
- Project Manager will work with the park's Historical Landscape Architect on a site furnishings plan, compatible with the Furnishings Guidelines, that minimizes historic-site impacts, and includes consideration of Battery Chester interior use.
- Project Manager will work with the park's NHPA Program Manager for review of any pilot camping program extension request or for a more permanent camping program.

## **H. SUMMARY OF PUBLIC COMMENT**

The Pacific Leadership Institute Overnight Proposal and Draft Categorical Exclusion was released for a 30-day public review and comment period on March 21, 2017, and ended on April 21, 2017. Within that time period, the NPS received 45 total correspondences from the public.

Comments were reviewed and analyzed for substantive content. See Attachment D "Public Comment Summary and Response to Comments" for a detailed discussion of the comments received and park responses.

## **I. DECISION / IMPLEMENTATION PROCESS**

A draft proposal and environmental compliance document for the Pacific Leadership Institute Overnight Program was released to the public for a 30-day public review and comment period from March 21 to April 21, 2017. The public was notified of this document's availability by email, on the park website, and social media outlets.

Following the 30-day public review and comment period, the NPS reviewed and analyzed the comments received. With consideration of the public's feedback, this document represents a final implementation decision made by the discretionary authority of the Superintendent.

PLI is expected to begin implementing this pilot program in late fall 2017. The pilot program will continue under the conditions outlined in Section E "Actions to be Implemented" for two years.



**National Park Service**  
**U.S. Department of the Interior**

**Golden Gate National Recreation Area**  
**Date: 09/08/2017**

## **ATTACHMENT B**

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### **Map and Site Plan**

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# ATTACHMENT B

## MAP & SITE PLAN

### Maps of Area



## Site Plan



### Note:

- All camping and program-related equipment will be “pack-in/pack-out” according to the conditions as found in Attachment A, Section E.
- Exact location and number of elements will vary depending on group sizes.
- Existing public portable toilet at intersection of Fort Miley Service Road and Veterans Drive will remain (as shown on pg. B-1).



National Park Service  
U.S. Department of the Interior

Golden Gate National Recreation Area  
Date: 09/08/2017

## ATTACHMENT C

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### **Letter of NHPA Section 106 Compliance Completion and Assessment of Actions Having an Effect on Historic Properties**

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## Letter of NHPA Section 106 Compliance Completion

H4217 (GOGA-CRMM)

DEC - 9 2016

### Memorandum

**To:** Stefanie Martin, Project Manager

**From:** General Superintendent, Golden Gate

**Subject:** NHPA Clearance: Fort Miley Ropes Course – Pilot Camping, Lands End (PEPC 65492)

The Cultural Assessment Team has reviewed the proposed project/action and completed its certification for compliance with the National Historic Preservation Act through our Park Programmatic Agreement. We have determined that there will be No Adverse Effect on historical, cultural, or archeological resources, provided you meet all stipulations identified below.

The subject proposed project/action(s), therefore, is/are now cleared for all NHPA compliance requirements as presented. Project plans and specifications are approved and construction and/or project implementation can commence once you have met any NEPA requirements, as well as all stipulations identified below.

For the proposed project actions to be within compliance requirements during construction and/or project implementation, the following cultural resource stipulations must be adhered to:

- Project Manager will upload to PEPC before and after site condition photos for comparative purposes.
- Project Manager will include Historical Landscape Architect (Amy Hoke, 561-4753) in the annual Business Management Division review of the pilot camping program site condition evaluation.
- Project Manager will work with Hoke on a site furnishings plan, compatible with the Furnishings Guidelines, that minimizes historic-site impacts, and includes consideration of Battery Chester interior use.
- Project Manager will work with NHPA Program Manager (Bob Holloway, 561-4976) for review of any pilot camping program extension request or for a more permanent camping program.

For complete compliance information see PEPC Project 65492. If you have any questions, please contact CRM Specialist (Curator) Bob Holloway at 415-561-4976.

Aaron Roth

*Jim F. [Signature]*  
Acting Superintendent



# ASSESSMENT OF ACTIONS HAVING AN EFFECT ON HISTORIC PROPERTIES

## A. DESCRIPTION OF UNDERTAKING

1. Park: Golden Gate National Recreation Area

### 2. Project Description:

**Project Name:** Fort Miley Ropes Course - Pilot Camping, Lands End

**Prepared by:** Bob Holloway **Date Prepared:** 10/26/2016 **Telephone:** 415-561-4976

**PEPC Project Number:** 65492

**Locations:**

**Describe project:**

The Pacific Leadership Institute (PLI) is a local organization focusing on outdoor/adventure education, team building, personal and professional development, and youth leadership training. The Fort Miley Adventure Ropes Course (FMACC) was built in 1979 within the Golden Gate National Recreation Area. In 1998 FMACC became a program of the Pacific Leadership Institute, housed in the Department of Recreation, Parks, and Tourism Department at San Francisco State University. The PLI currently deliver over 350 programs each year serving more than 10,000 participants with demand continuing to grow.

This PEPC entry solely covers a temporary small group campsite that will accommodate up to 20-25 campers on the upper lawn area at Fort Miley. Located on the southern edge of this lawn, they propose to develop a small group campsite with tent area, kitchen/meal prep area, additional picnic tables, (possibly) fire pit, and sitting area (e.g., circle of logs).

The PLI is now seeking to leverage and build off of existing successful programs at West Fort Miley (WFM) in order to achieve new growth in both numbers served and outcomes desired. With the long term vision of extending PLI's footprint at WFM, this pilot proposal will help accomplish the following: transform the landscape, meet the demand for programs, increase impact on participants, enhance partnerships, and better serve urban youth in learning outdoor leadership as a means to empower and improve lives and communities.

This future expansion will also enable the PLI to fulfill their mission by creating a pathway from outdoor adventures and college access, to meaningful employment and career opportunities. PLI would propose to unfold this expansion in 3 phases over the next 5-years by developing an additional low element circuit course, one large group camp site and a second universally accessible ropes course and zip line center to the hillside at West Fort Miley.

This project is only for the temporary camping proposal at WFM, all of these other ideas will be brought through compliance at a future date.

A document has been uploaded to PEPC for clarification of the proposed activity.

**Area of potential effects (as defined in 36 CFR 800.16[d])**

West Fort Miley landscape and Battery Chester (FI-001 and FI-002) within the Lands End/Sutro Historic District

**3. Has the area of potential effects been surveyed to identify historic properties?**

No

Yes

**Source or reference:** Sutro Historic District CLI, CLR, CD, EA, RAS and Abbreviated CLR (Lands End)

**4. Potentially Affected Resource(s):**

**Archeological Resources Notes:** Resources are present within the district but will not be affected due to project design.

**Historical Structures/Resources Notes:** Battery Chester (FI-001 and FI-002) within the Lands End/Sutro Historic District

**Cultural Landscapes Notes:** The Lands End/Sutro Historic District Cultural Landscape

**Ethnographic Resources Affected Notes:** Resources are present within the district but will not be affected due to project design.

**5. The proposed action will: (check as many as apply)**

**Destroy, remove, or alter features/elements from a historic structure**

**Replace historic features/elements in kind**

**Add non-historic features/elements to a historic structure**

**Alter or remove features/elements of a historic setting or environment (inc. terrain)**

**Add non-historic features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape**

**Disturb, destroy, or make archeological resources inaccessible**

**Disturb, destroy, or make ethnographic resources inaccessible**

**Potentially affect presently unidentified cultural resources**

**Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources**

**Involve a real property transaction (exchange, sale, or lease of land or structures)**

**Other (please specify):** \_\_\_\_\_

**6. Supporting Study Data:**

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

**B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS**

Assessment of Effect Form - Fort Miley Ropes Course - Pilot Camping, Lands End - PEPC ID: 65492

The park 106 coordinator requested review by the park's cultural resource specialist/advisors as indicated by check-off boxes or as follows:

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106 Advisor

Name: Bob Holloway

Date: 10/26/2016

Comments: Reviewed at 5x/PR 10/26/16 and certified No Adverse Effect with stipulations.

*Check if project does not involve ground disturbance*

Assessment of Effect:  No Potential to Cause Effect  No Historic Properties Affected  No Adverse Effect  Adverse Effect  Streamlined Review

Recommendations for conditions or stipulations: 1) Project Manager will upload to PEPC before and after site condition photos for comparative purposes. 2) Project Manager will include Historical Landscape Architect (Amy Hoke, 561-4753) in the annual Business Management Division review of the pilot camping program site condition evaluation. 3) Project Manager will work with Hoke on a site furnishings plan, compatible with the Furnishings Guidelines, that minimizes historic-site impacts, and includes consideration of Battery Chester interior use. 4) Project Manager will work with NHPA Program Manager (Bob Holloway, 561-4976) for review of any pilot camping program extension request or for a more permanent camping program.

Doc Method: Park Specific Programmatic Agreement

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Archeologist

Name: Peter Gavette

Date: 10/26/2016

Comments: Reviewed at 5x/PR 10/26/16



*Check if project does not involve ground disturbance*

Assessment of Effect:  No Potential to Cause Effect  No Historic Properties Affected  No Adverse Effect  Adverse Effect  Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Park Specific Programmatic Agreement

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Curator

Name: Bob Holloway

Date: 10/26/2016

Comments: Reviewed at 5x/PR 10/26/16



*Check if project does not involve ground disturbance*

Assessment of Effect:  No Potential to Cause Effect  No Historic Properties Affected  No Adverse Effect  Adverse Effect  Streamlined Review

Recommendations for conditions or stipulations:

Doc Method: Park Specific Programmatic Agreement

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Historian

Name: Stephen Haller

Assessment of Effect Form - Fort Miley Ropes Course - Pilot Camping, Lands End - PEPC ID: 65492

Date: 10/26/2016  
Comments: Reviewed at 5x/PR 10/26/16



Check if project does not involve ground disturbance [ X ]  
Assessment of Effect:  No Potential to Cause Effect  No Historic Properties Affected  No Adverse Effect  
 Adverse Effect  Streamlined Review  
Recommendations for conditions or stipulations:

Doc Method: Park Specific Programmatic Agreement

Historical Architect  
Name: Jill Johnson  
Date: 10/26/2016



Check if project does not involve ground disturbance [ X ]  
Assessment of Effect:  No Potential to Cause Effect  No Historic Properties Affected  No Adverse Effect  
 Adverse Effect  Streamlined Review  
Recommendations for conditions or stipulations:

Doc Method: Park Specific Programmatic Agreement

Historical Landscape Architect  
Name: Amy Hoke  
Date: 10/26/2016  
Comments: Reviewed at 5x/PR 10/26/16



Check if project does not involve ground disturbance [ X ]  
Assessment of Effect:  No Potential to Cause Effect  No Historic Properties Affected  No Adverse Effect  
 Adverse Effect  Streamlined Review  
Recommendations for conditions or stipulations: 1) Project Manager will upload to PEPC before and after site condition photos for comparative purposes. 2) Project Manager will include Historical Landscape Architect (Amy Hoke, 561-4753) in the annual Business Management Division review of the pilot camping program site condition evaluation. 3) Project Manager will work with Hoke on a site furnishings plan, compatible with the Furnishings Guidelines, that minimizes historic-site impacts, and includes consideration of Battery Chester interior use.

Doc Method: Park Specific Programmatic Agreement

No Reviews From: Other Advisor, Anthropologist

**C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS**

**1. Assessment of Effect:**

- No Potential to Cause Effects
- No Historic Properties Affected
- No Adverse Effect

Assessment of Effect Form - Fort Miley Ropes Course - Pilot Camping, Lands End - PEPC ID: 65492

Adverse Effect

**2. Documentation Method:**

**A. STANDARD 36 CFR PART 800 CONSULTATION**  
Further consultation under 36 CFR Part 800 is needed.

**B. STREAMLINED REVIEW UNDER THE 2008 SERVICEWIDE PROGRAMMATIC AGREEMENT (PA)**

The above action meets all conditions for a streamlined review under section III of the 2008 Servicewide PA for Section 106 compliance.

**APPLICABLE STREAMLINED REVIEW Criteria**  
(Specify 1-16 of the list of streamlined review criteria.)

**C. PLAN-RELATED UNDERTAKING**

Consultation and review of the proposed undertaking were completed in the context of a plan review process, in accordance with the 2008 Servicewide PA and 36 CFR Part 800.  
Specify plan/EA/EIS:

**D. UNDERTAKING RELATED TO ANOTHER AGREEMENT**

The proposed undertaking is covered for Section 106 purposes under another document such as a statewide agreement established in accord with 36 CFR 800.7 or counterpart regulations.

Golden Gate P.A. II.B. 1. Preservation Maintenance (cleaning, routine maintenance, cyclic maintenance, stabilization and building monitoring) consisting of: d. Maintenance, repair, rehabilitation, and restoration of historic vegetation, vistas, and small-scale features. Addition of non-historic landscape features must meet the Secretary of the Interior's Standards for the Treatment of Historic Properties; and 3. Military Fortifications Preservation and Management, including the following activities: a. Maintenance and preservation work limited to retaining, protecting, and/or replacing in-kind materials and features that are deteriorated beyond repair and that contribute to the National Register significance of the fortification, including its associated landscape and archeological properties.

**E. COMBINED NEPA/NHPA Document**

Documentation is required for the preparation of an EA/FONSI or an EIS/ROD has been developed and used so as also to meet the requirements of 36 CFR 800.3 through 800.6

**G. Memo to SHPO/THPO**

**H. Memo to ACHP**

**SHPO/THPO Notes:**

**3. Additional Consulting Parties Information:**

**Additional Consulting Parties: No**

**4. Stipulations and Conditions:**

Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse

Assessment of Effect Form - Fort Miley Ropes Course - Pilot Camping, Lands End - PEPC ID: 65492

effects.

Reviewed at 5x/PR 10/26/16 and certified No Adverse Effect with stipulations. 1) Project Manager will upload to PEPC before and after site condition photos for comparative purposes. 2) Project Manager will include Historical Landscape Architect (Amy Hoke, 561-4753) in the annual Business Management Division review of the pilot camping program site condition evaluation. 3) Project Manager will work with Hoke on a site furnishings plan, compatible with the Furnishings Guidelines, that minimizes historic-site impacts, and includes consideration of Battery Chester interior use. 4) Project Manager will work with NHPA Program Manager (Bob Holloway, 561-4976) for review of any pilot camping program extension request or for a more permanent camping program.

**5. Mitigations/Treatment Measures:**

Measures to prevent or minimize loss or impairment of historic/prehistoric properties:  
(Remember that setting, location, and use may be relevant.)

- Assessment of Effect - Cultural Landscapes - Project Manager will upload to PEPC before and after site condition photos for comparative purposes.
- Assessment of Effect - Cultural Landscapes - Project Manager will include Historical Landscape Architect (Amy Hoke, 561-4753) in the annual Business Management Division review of the pilot camping program site condition evaluation.
- Assessment of Effect - Cultural Landscapes - Project Manager will work with Hoke on a site furnishings plan, compatible with the Furnishings Guidelines, that minimizes historic-site impacts, and includes consideration of Battery Chester interior use.
- Assessment of Effect - Project Manager will work with NHPA Program Manager (Bob Holloway, 561-4976) for review of any pilot camping program extension request or for a more permanent camping program.

**D. RECOMMENDED BY PARK SECTION 106 COORDINATOR:**

Compliance Specialist:

NHPA Specialist

Bob Holloway      CRM Specialist (Curator)      Date: 10/26/16

**E. SUPERINTENDENT'S APPROVAL**

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Superintendent:       Signature      Date: 12/19/16

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**National Park Service**  
**U.S. Department of the Interior**

**Golden Gate National Recreation Area**  
**Date: 09/08/2017**

## **ATTACHMENT D**

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### **Public Review and Comment Summary**

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## ATTACHMENT D

### Public Review and Comment Summary

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#### A. PUBLIC REVIEW BACKGROUND

National Park Service (NPS) DO-12 NEPA Handbook guidance for Categorical Exclusions suggests seeking public comment in situations where there is a high degree of public interest or uncertainty regarding potential effects of a proposed action. The NPS solicited public feedback on the Pacific Leadership Institute (PLI) Overnight Program both prior to release of the proposal, and for a total of 30 days following the release of the Proposal and Draft Categorical Exclusion.

Representatives from NPS and PLI attended March 2017 community meetings to provide information about the proposal, receive feedback, and advise neighbors on how to provide comments. See Attachment A, Section D “Development of Proposal (Pre-Proposal Scoping)” for additional details on the proposal scoping process.

#### B. PUBLIC COMMENT SUMMARY AND RESPONSES

The Pacific Leadership Institute Overnight Program Proposal and Draft Categorical Exclusion was released for a 30-day public review and comment period on March 21, 2017, and ended on April 21, 2017. Within that time period, the NPS received 45 total correspondences from the public. Included within the 45 correspondences, were comments submitted by individuals who identified themselves as official representatives from the following seven agencies or organizations:

- Drew School
- Friends of Lands End
- People for a GGNRA
- Planning Association for the Richmond
- San Francisco VA Health Care System
- Sierra Club
- Treasure Island Development Initiative

The comments submitted by these agencies or organizations have been included within the themed summaries and responses below.

Comments were reviewed and analyzed for substantive content. NEPA requires the National Park Service to respond to substantive comments. As defined in the NPS DO-12 NEPA Handbook,

“Substantive comments are those that:

- question, with reasonable basis, the accuracy of the information in the NEPA document;
- question, with reasonable basis, the adequacy of the environmental analysis;
- present reasonable alternatives other than those presented in the NEPA document; or

- cause changes or revisions in the proposal.

“In other words, substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response.”<sup>1</sup>

In general, a commenter’s personal opinion on a subject is not considered substantive comment. Where appropriate, the impact analysis was revised for corrections and clarifications from substantive comment.

## C. RESPONSE TO COMMENTS

Following the 30-day comment period, the NPS reviewed the comments received. With consideration of the public’s feedback, Attachment A, Section E “Actions to be Implemented” describes the final set of actions to be implemented. The summarized concerns and responses below respond to the substantive comments received during the public review and comment period.

### • Theme 1 – Alternatives: Program Location

A number of comments stated the opinion that West Fort Miley was an inappropriate place for camping, citing that the proposed location is adjacent to residential neighborhoods, a VA medical facility, and is not designed for formal camping. Some commenters recommended alternate locations such as East Fort Miley, Rob Hill in the Presidio, the Marin Headlands, and Kirby Cove.

- NPS Response: The proposed location is consistent with the park’s General Management Plan (GMP). West Fort Miley has been identified in the GMP as an Evolved Cultural Landscape Zone, and the GMP states that “Improved picnicking and group camping facilities would be provided in an appropriate location”<sup>2</sup> (Vol. 1, pg. 132). The programmatic impacts associated with this type of use have been analyzed and disclosed in the GMP Environmental Impact Statement (EIS), specifically as related to this program in Vol. 2, pgs. 204, 208, 213, and 242. Furthermore, West Fort Miley is an appropriate location for this temporary pilot program because of the ability to most closely match the conditions under which a long term camp would operate. Removing the pilot program from PLI’s operations at West Fort Miley would reduce the ability of the pilot program to truthfully inform planning for future programs. Finally, any of the alternate locations mentioned by commenters are already at capacity, and are not within close enough proximity to PLI’s existing area of operations to be operationally feasible for this pilot program.

See Attachment A, Section F “Impact Assessment” for a detailed discussion of the potential impacts of the project, including those to neighbors, as well as responses to Themes 3, 7, 8, 11, and 12 below.

### • Theme 2 – New Alternatives or Elements

Many comments offered new alternatives or elements for the Pacific Leadership Institute Overnight Program. Many of these alternatives and elements are discussed under other topics or themes. The remaining new alternatives or elements are as follows:

- Reduce the number of activity/camp nights. One commenter suggested “five or so times per year”.
  - NPS Response: This alternative has been considered and dismissed as not operationally feasible for PLI, and therefore unable to meet the purpose and need of the proposal. Five camp nights per year

<sup>1</sup> National Park Service. (2015). *NPS NEPA Handbook (2015)*. Retrieved from Environmental Quality Division: Environmental Planning & Compliance Branch: [http://www.nps.gov/orgs/1812/upload/NPS\\_NEPAHandbook\\_Final.pdf](http://www.nps.gov/orgs/1812/upload/NPS_NEPAHandbook_Final.pdf)

<sup>2</sup> National Park Service. (2014). *Golden Gate National Recreation Area Muir Woods National Monument Final General Management Plan/Environmental Impact Statement*. Retrieved from [https://www.nps.gov/goga/learn/management/upload/GOGA\\_FGMP\\_Volume\\_I-3.pdf](https://www.nps.gov/goga/learn/management/upload/GOGA_FGMP_Volume_I-3.pdf)

would not provide the operating efficiencies necessary for PLI to provide this pilot program. So few nights per year would also not sufficiently match the conditions under which a long term camp would operate and therefore would reduce the ability of the pilot program to truthfully inform planning for future programs.

- Annual meetings between Business Management Division (BMD) and PLI should include other stakeholders.
  - NPS Response: Annual meetings between partners and BMD are not an appropriate forum for public or stakeholder engagement. The park proactively reached out to key neighbors and stakeholders prior to the Proposal and Draft Categorical Exclusion's release, and expects to continue those dialogues. NPS encourages ongoing communication between interested and affected parties and PLI, and with NPS through existing methods and channels. BMD will review complaints and communications related to this pilot program and facilitate ongoing stakeholder engagement as relevant and appropriate. Attachment A, Section E "Actions to be Implemented" has been updated to reflect this change.
- The pilot program should be reduced to one year.
  - NPS Response: The pilot may be reduced to less than the full two years proposed at any time by PLI or NPS. In order to meet the project's purpose and need, it is important to get more than one year of baseline data to provide PLI a reasonable projection as to possible success or failure and sustainability of a more permanent operation.

- **Theme 3 – Air Quality: Impact Of Proposal And Alternatives**

Multiple comments highlighted concern for the presence of a temporary fire pit used by PLI's overnight programming. Commenters were concerned with smoke and particulates entering nearby homes and the adjacent Veterans Affairs Medical Center facilities.

- NPS Response: As stated in the proposal, PLI will ensure any campfires are limited to a single portable fire pit, and will occur only under the conditions designated by the Superintendent's Compendium, Section 2.13 "Fires". This helps to ensure, in part, that fires would not occur on days when fire danger is high, very high, or extreme such as during very hot, dry weather conditions, "Spare the Air" days, strong winds, and extreme fire danger days or by order of the Superintendent. Furthermore, West Fort Miley is an appropriate location for this temporary pilot program because barbeques are already permitted at the site.

- **Theme 4 - Cultural Resources: Impact Of Proposal And Alternatives**

A single commenter stated the proposed activity may increase vandalism of and wear-and-tear on historic resources.

- NPS Response: The GGNRA GMP states that West Fort Miley "historic structures and cultural landscape would be preserved and enhanced"<sup>3</sup> (Vol. 1, pg. 132). It is expected that consistent with management practices and trends observed in other areas of the park, increased usage of this area, especially overnight, would decrease vandalism on historic structures. Additional wear-and-tear on historic resources in the area due to the overnight programming is unlikely, as the activities to be undertaken by PLI will occur mainly on the West Fort Miley lawn, which is not an historic resource. The proposal has been reviewed by the park Cultural Resources Assessment Team under Section 106 of the National Historic Preservation Act, and has been certified as having No Adverse Effect to cultural resources with stipulations. Those

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<sup>3</sup> National Park Service. (2014). *Golden Gate National Recreation Area Muir Woods National Monument Final General Management Plan/Environmental Impact Statement*. Retrieved from [https://www.nps.gov/goga/learn/management/upload/GOGA\\_FGMP\\_Volume\\_I-3.pdf](https://www.nps.gov/goga/learn/management/upload/GOGA_FGMP_Volume_I-3.pdf)

stipulations can be found in Attachment A, Section G “National Historic Preservation Act (NHPA) Section 106 Compliance”.

- **Theme 5 - Environmental Compliance: NEPA, other Policies, Regs, & Laws**

The park received divergent comments regarding the impact assessment and NEPA compliance for this proposal. Some concurred with the impact assessment as presented and the limited nature of the expected environmental impacts of the proposal. Others expressed concern that this activity should not be considered a Categorical Exclusion and that this proposal represents a new, unprecedented use at West Fort Miley.

- NPS Response: The proposal is consistent with the park’s GMP, and the programmatic impact analysis in the GMP EIS (see Theme 1 response for additional details and citation). The impact analysis enclosed in Attachment A, Section F “Impact Assessment”, analyses the site-specific effects as are anticipated associated with the details of the proposal. In accordance with NPS NEPA guidelines found in the 2015 NPS NEPA Handbook (DO-12), the NPS has found the proposed action consistent with the Categorical Exclusion Section 3.3, citation A.5, and has found that no exceptional circumstances in Section 3.5 apply.

To clarify, the Actions to be Implemented only includes activities associated with PLI’s proposed overnight programs. While PLI has a conceptual plan for a possible future expansion which could include an additional low element circuit, a second ropes course, and zip line circuit, none of those actions are currently proposed for implementation and therefore not included within this review except as reasonably foreseeable future actions considered under cumulative impact analysis.

The park does not agree that PLI’s proposed program establishing a precedent for permitted camping at West Form Miley. As mentioned in Attachment A, permitted camping has occurred previously at West Fort Miley, most recently during the NPS Centennial event Packing the Parks. Public camping is also allowed elsewhere within GGNRA, and this program will be explicitly allowed as a pilot and does not represent approval of a permanent or long-term change in use.

- **Theme 6 - Geologic Resources: Impact Of Proposal And Alternatives**

A single commenter stated concern for erosion, citing conditions they have observed over the time PLI has conducted its existing ropes course operation.

NPS Response: This proposal calls for no expansion or change in PLI’s existing ropes course (Adventure Challenge Course) operation. The overnight program will not introduce any new structures or changes in landscaping, and will not alter the pattern of surface water flow, alter hydrologic processes, or create erosion at the ropes course, nor elsewhere near the pilot overnight programming site. The impact assessment in Attachment A, Section F has been updated to reflect this analysis.

- **Theme 7 - Lightscares: Impact Of Proposal And Alternatives**

The park received two comments with concern for increased light at Lands End. One comment raised a concern specifically that, “Nighttime camping may also conflict with the Star Parties held at Lands End by the San Francisco Amateur Astronomers.”

- NPS Response: The National Park Service is a leader in maintaining night skies. The NPS has a Night Skies initiative, and states “A dark night is a resource integral to many natural processes. Many of the darkest night skies in the country are found within national park boundaries. With the loss of night sky quality over the last five decades to light pollution, this resource has become nationally significant”<sup>4</sup>. GGNRA remains committed to maintaining night skies, and as stated in Attachment A, will ensure through conditions of the Special Use Permit for PLI operations that all overnight programming activities

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<sup>4</sup> National Park Service. (2017, May 8). *Night Skies as a Natural Resource*. Retrieved from Night Sky Resources: <https://www.nps.gov/subjects/nightskies/natural.htm>

are “consistent with NPS Night Skies best management practices (BMPs), including lights out and fires out by 9:30 pm”. There will be no new lighting installed as part of the pilot overnight program.

Any event held by an organized group that receives a Special Use Permit for use of the facilities at West Fort Miley will be accommodated within PLI’s overnight programming schedule through coordination with the GGNRA Office of Special Park Uses. A condition to this effect has been added to Attachment A, Section E “Actions to be Implemented”. Any smaller, non-permitted activities will continue to be able to use the public areas not designated for use by PLI, including the northern and western areas of the West Fort Miley lawn and Battery Chester apron.

- **Theme 8 - Neighbors: Privacy**

Residents along Seal Rock Dr. voiced concern about a lack of privacy, specifically around sight lines for program participants into adjacent windows and backyards if this proposal is allowed to proceed.

- NPS Response: The program location is currently a public area in which NPS does not limit visitors to specific times or areas. There are no new areas that PLI will use for programming which are not already accessible to, and used routinely by the public.

- **Theme 9 - Park Operations: Impacts**

The park received a number of comments expressing assumptions of how the pilot overnight program might impact park operations. Some comments expressed the opinion that the program would be well run in the existing manner of PLI programs, with very little associated impact on NPS operations. Some comments concurred with the NPS assumption that additional activation of the site and presence of program participants would deter illegal activity and associated operational concerns. Other comments voiced concerns about increased littering, increased trash, lack of toilets, increased potential for fires, graffiti, vandalism, an increase in homeless unauthorized camping, and this site as an inappropriate location for camping. The adjacent San Francisco Veterans Affairs Health Care System (SFVAHCS) facility commented that NPS should ensure that SFVAHCS is notified in advance of all dates of this event, and that participants do not park on SFVAHCS property.

- NPS Response: The proposed location is consistent with the park’s GMP, and the programmatic impact analysis in the GMP EIS (see Theme 1 response for additional details and citation). In its existing condition, this area suffers from vandalism and homeless encampments. It is expected that consistent with management practices and trends observed in other areas of the park, increased usage of this area, especially overnight, would decrease illegal uses and activities such as littering, graffiti, vandalism, and unauthorized camping. Consistent with the expected decrease in these illegal uses and activities, NPS expects very little adverse impacts, and potentially positive impacts on NPS operations.

There is currently one public restroom adjacent to the facility, and garbage receptacles. As part of the permit, and already practiced at PLI’s ropes course, a pack in-pack out mantra will be followed. In addition, PLI will be providing a portable toilet for each overnight program it provides. This portable toilet will be delivered and removed within 48 hours of scheduled programming and will remain locked when not used by PLI. As disclosed in the impact assessment, NPS will continue existing maintenance operations with no change in schedule, and PLI will pack in and pack out all equipment, food, and trash that does not fit in trash receptacles, related to the overnight program. This has been added to Attachment A, Section E as a condition to be included in the Special Use Permit.

NPS will ensure notification to SFVAHCS of all expected program dates through inclusion of an applicable condition within the Special Use Permit to be issued to PLI, as is consistent with the condition included in Attachment A, Section E. The condition has been updated to include the provision that no parking on SFVAHCS property will be allowed.

- **Theme 10 – Purpose and Need: Park Purpose and Significance; Objectives In Taking Action**

Many comments were received aligning the proposed use at West Fort Miley with the establishing legislation and mission of GGNRA. Other comments expressed that the proposed action will be well suited to meeting the purpose and need of the proposal. Concerns were voiced regarding possible corporate usage of this pilot and a lack of nature experience and associated benefit for participating students.

- NPS Response: Long standing members of the community have commented that this proposed usage of WFM is a primary reason why the park was established, to bring city kids to a national park. Many students who participate in PLI’s programming have never visited a national park, and despite living within relatively short distances to a park, either do not visit, or do not feel comfortable while in a park setting. Even though this activity is adjacent to an urban environment, there is enough of a separation for students to get a “taste” of a natural setting, while still being adjacent to an urban environment, an environment they find more comforting. NPS will ensure that all participants within the pilot phase of this proposal will be from educational groups, and not corporate entities. This condition has been added to Attachment A, Section E.

- **Theme 11 - Socioeconomics: Impact Of Proposal And Alternatives**

Nearby residents raised concerns about property values decreasing by “at least 25%” (from a current estimate of \$55 million for the properties backing on Lands End) if this proposal was allowed. One comment stated, “While I appreciate the value of the activity for the children, I suspect their regular presence here incurs a cost on the neighborhood in terms of our property values and quality of life.” Another resident is concerned that this would be a required disclosure if they were to sell their property.

- NPS Response: NPS does not believe this temporary pilot program will affect home values. PLI currently runs a ropes course, year around, adjacent to Seal Rock Drive. The pilot overnight program states 50-70 groups will camp overnight during this 2 year period. This is an increase of 375-1,050 persons over a two year period – currently PLI brings 10,000 participants to the Fort Miley ropes course annually. The piloting of this program does not fit into any of the 16 standard California required disclosures for sale. While not mentioned specifically, “Neighborhood noise problems or other nuisances” is the closest item listed in the standard disclosures. NPS does not expect that this pilot activity will create new issues in the area, and expects that the additional activity in the area will likely reduce other nuisances as discussed above in Theme 9.

- **Theme 12 - Soundscapes: Impact Of Proposal And Alternatives**

Comments were received stating concern for noise to become problematic and not manageable by supervision, which could impact neighbors, and the adjacent medical facility. Some individuals voiced concern for early morning noise, others, with concerns that day-time noise associated with current programming might continue after 5pm. Some comments expressed a belief that the conditions set forth in the proposal would either be inadequate or not enforced, while other comments were received stating the guidelines set forth in the draft CE were adequate.

- NPS Response: Currently, NPS issues permits at West Fort Miley for daylight hours only. Annually a group of amateur radio operators receive an overnight permit to conduct emergency radio testing, and no complaints have been received. As stated in the draft CE, “The location is tucked in a corner of the lawn with a grove of trees and approximately 100 yards separating the location from a residential area. Quiet hours would be strictly enforced, and PLI would manage participants very tightly. With security and a high ratio of adults to youth, a close eye would be placed on activities.” PLI is aware that program noise is a large concern of neighbors and will endeavor, primarily through additional direct messaging to participants, to keep sound, especially during nighttime and early morning, to a minimum.

In accordance with Director's Order 47: Soundscape Preservation and Noise Management (DO47), the increased activity through overnight programming meets the definition of appropriate noise as per enabling legislation for GGNRA. Overnight programming, and all associated activities will be kept at 65dB, measured on the A-weighted scale, at 50' (per requirements in 36CFR§2.12). Preliminary tests by PLI have determined programming activities will not result in sound exceeding this requirement. Consistent with DO47's "addressing the problem," during the pilot phase PLI will strictly monitor sound for the first 4 overnight programs, and once per month thereafter.

- **Theme 13 - Wildlife, Wildlife Habitat, and Vegetation: Impact Of Proposal And Alternatives**

Comments received noted a concern that the proposed pilot program would increase trash, create sanitation issues (human waste), lead to vegetation trampling, and possibly lead to a negative impact on wildlife and native vegetation. Red tail hawks and bats were species specifically mentioned.

- NPS Response: As part of the conditions for the pilot program, PLI will be required to pack in and pack out all trash, food, etc., create and implement a Waste Management Plan, and bring a portable toilet on site during programming. All locations within the pilot program will be on high use, developed areas (i.e. asphalt, pavement, and lawn) and PLI will not be permitted to use any trails beyond the existing network of publicly accessible trails already in use. Most vegetation in the area is non-native, and the site primarily consists of asphalt, pavement, and lawn surrounded by non-native trees. The proposed programming will not require removal or disturbance of trees or other vegetation over 18 inches in height, and is therefore unlikely to affect hawks or other native birds. PLI is aware of the sensitivities of local migratory birds, and has worked diligently with NPS Wildlife Ecologists in the past to ensure programming and other activities do not disturb nesting raptors. Impacts to bats in the area would be negligible. The limited night lighting associated with the pilot program may attract insects that bats feed on during periods when the lights are on. While this could change the bats foraging behavior, it would not necessarily cause an adverse impact. It is unlikely any impacts from camping lanterns and flashlights associated with the pilot program on bats could be quantified. The impact assessment in Attachment A, Section F has been updated to reflect this analysis.

- **Theme 14 - Visitor Conflicts, Safety, Experience, and Use: Impact Of Proposal And Alternatives**

Based on the draft CE, the park received comments that the addition of overnight programming would: disrupt the quiet natural atmosphere; ruin natural beauty; lead to too many people visiting the site; provide too many nights for programming; limit access to WFM; increase car traffic, drug use, and homelessness; and increases litter and noise pollution and accidental fires. Some comments included a concern for the potential of additional "graffiti, vandalism, break-ins and arson." Locals voiced concern that the highest use time for nearby residents is 2 hours before sunset. One person mentioned a concern the NPS is focusing too much on youth and requested other age groups, specifically seniors, be included. Other comments expressed the belief that the conditions of use required by NPS would ensure an improved experience for all visitors to the area over the current situation.

- NPS Response: The proposed location is consistent with the park's GMP, and the programmatic impact analysis in the GMP EIS (see Theme 1 response for additional details and citation). See Theme 4 for a discussion of potential impacts to historic resources. While some areas of Fort Miley offer a quite natural environment, the proposed programming would focus impact on the existing picnic area, which is a landscaped environment which currently experiences concentrated use.

West Fort Miley has limited trails and a service road which is used sparingly. There is a history of vandalism and homeless encampments in this area of the park, which is often associated with too little use of an area. This location is also one of the lesser visited sites in the park, with few permits issued for this location annually, and most visitors using Lands End and the nearby Coastal Trail instead.

The proposed overnight programming requires PLI to remove all equipment 2 hours after sunrise until 2 hours prior to sunset, this requirement is to minimize the visual impact on the area and to minimize a negative visitor experience. PLI will be allowed to drive one vehicle along the service road, as is currently permitted, but will not be allowed to increase traffic in the area. No access limits will be placed on visitors not associated with PLI. While PLI has equipment laid out, visitors will still be allowed to enjoy this location. PLI will be required to pack in and pack out all trash, food, and equipment. Program participants will have close supervision by PLI staff and no drug use will be tolerated, as is PLI's current policy.

All fires associated with PLI programming will be conducted and monitored solely by PLI staff under close supervision at all times in a single portable fire ring, and would only occur under the strict guidelines as listed in the Superintendent's Compendium, Section 2.13 "Fires". This will ensure fires are not permitted on "Spare the Air" days or when fire danger is high, very high, or extreme. Other concerns regarding additional "graffiti, vandalism, break-ins and arson" are responded to above, under Theme 9 "Park Operations: Impacts".

PLI has been at the current ropes course location for more than 30 years, has been a good neighbor and park partner. PLI's programming focusses on youth in alignment with their mission, but participants are of all ages are welcome.