

ERRATA

MORI POINT RESTORATION AND TRAIL PLAN ENVIRONMENTAL ASSESSMENT

An Errata sheet is necessary to address substantive comments made on the Environmental Assessment (EA). Substantive comments are those that modify the existing alternatives, propose new alternatives not previously considered, supplement, improve or modify the impact analysis, or make factual corrections. The corrections in this Errata sheet do not change the project activities or increase the degree of impact described in the EA. Changes to the text and justification are provided below.

CHANGES TO TEXT

Changes to the text to reflect modifications made in response to public and agency comment. Existing text to remain is in *italics*, additions to the text are underlined and deleted text is shown in ~~strikeout~~.

Page 12, Section, 1.6 Scope of Environmental Assessment, third bullet:

- *Dog walking. Dog walking on site will be evaluated through an ongoing federally-sanctioned Negotiated Rulemaking process. However, due to the endangered species at the site, off-leash dog walking will not be considered at Mori Point. The Negotiated Rulemaking process will determine where dogs can be allowed on leash. More information on this planning process can be found at www.nps.gov/goga and <http://parkplanning.nps.gov/goga>.*

Page 12, Section, 1.6 Scope of Environmental Assessment, add this fourth bullet:

- Special park uses, such as but not limited to, paragliding, weddings, concerts, etc. Special park uses at Mori Point will be reviewed and approved on a case-by-case basis.

Page 40, Section 2.4.3 Other Recreational Use Alternatives Eliminated from Detailed Study

~~2.4.3 Other Recreational Use Alternatives Eliminated from Detailed Study~~

~~Paragliding:~~

~~Future permitted use of the site for paragliding landing was considered but rejected based on the negative impacts to threatened and endangered species habitat.~~

See above added text on Page 12 for clarification on this deletion. Special Park Uses will not be permitted in sensitive endangered species habitat.

Page 68, 3.6.2.2 Environmental Consequences – Vegetation and Native Plant Communities, Alternative 1, 3rd Mitigation and Page 154, Mitigation Table

- *At the discretion of a qualified biologist ~~the project Biological Monitor~~, restrictions will be placed on the movement or deposition of fill, rock, or other materials containing weed seed or viable plant cuttings to areas relatively free of weeds.*

Page 72, Section 3.6.3.1 Affected Environment - Wetlands

In January 2006, a formal wetland delineation of the remaining portion of the project area was conducted in accordance with USACE methods. ~~This~~ That delineation concluded that four additional areas (Sites B through E) exhibited wetland characteristics to be considered potentially jurisdictional by the USACE (Table 5; Figure 14). These four wetland areas totaled 0.13 acre; one of the delineated features also supported 479 linear feet of “other waters” as an unvegetated drainage ditch supporting perennial downstream flows. A subsequent delineation with the USACE in March 2006 determined Sites D and E to be non-USACE jurisdictional due to isolation. At that time, another wetland, Site F, was

added. At Site F, the existing pond would be expanded/deepened. This change did not alter the impact conclusions made in the EA.

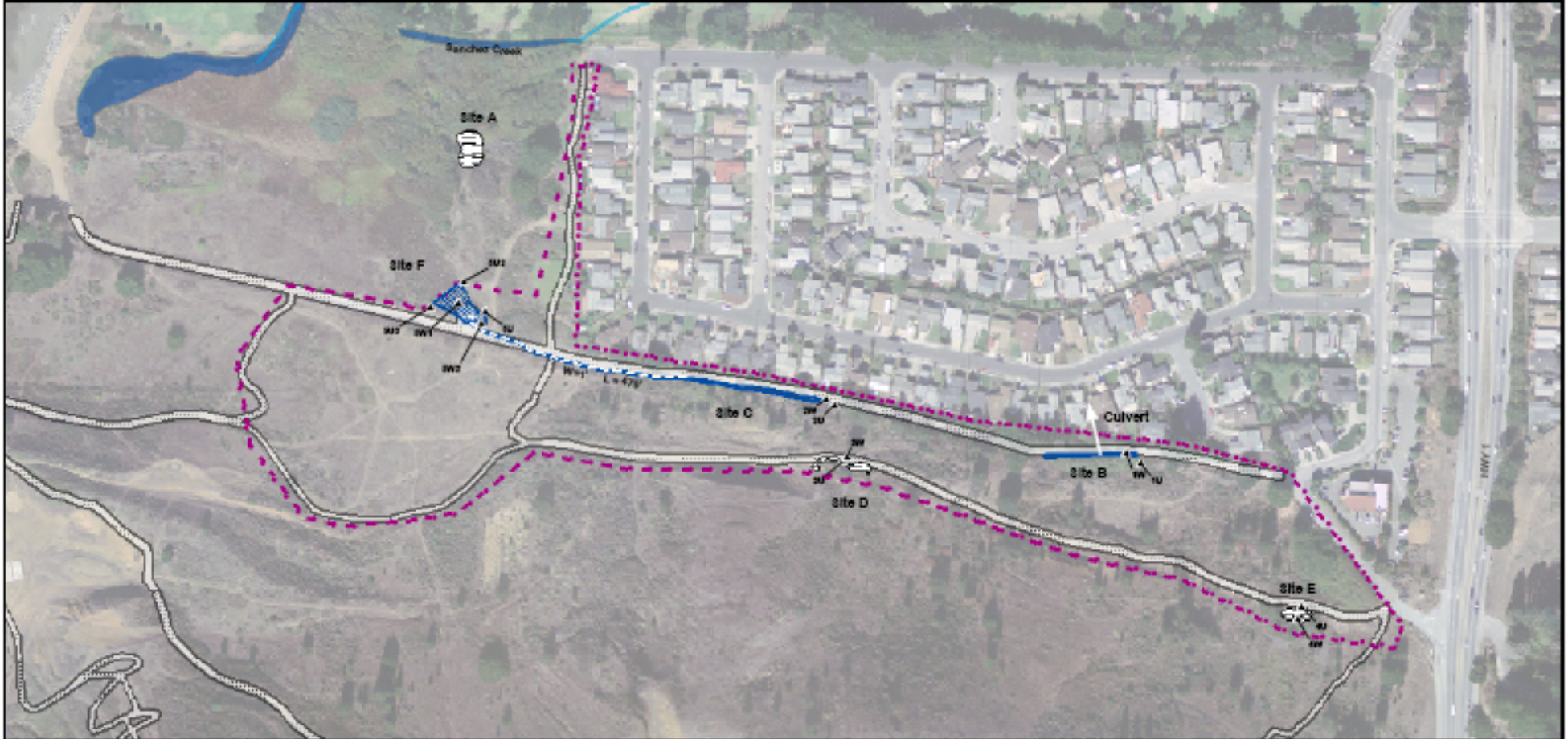
Page 72, Section 3.6.3.1 Affected Environment - Wetlands

TABLE 5. POTENTIALLY JURISDICTIONAL USACE WETLANDS AND WATERS AT MORI POINT.

Site	Potential Jurisdictional Wetland (Acres)	Temporary Impacts to Potential Jurisdictional Waters (linear feet)
Site B	0.02	
Site C	0.05	479
Site D	0.03	
Site E	0.03	
Site F	<u>>0.07</u>	<u>.0003 acres</u>
Total Wetlands and Waters	<u>0.14</u>	<u>479 lf plus 0.0003 acres</u>

Page 73, Figure 14, Potential Jurisdictional Wetlands at Mori Point

Map on following page



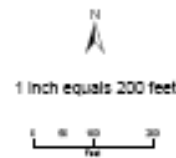
Area of Detail









Wetland delineations conducted by Laura Castellini,
NPS, 1/25/08, 2/24/08, 3/23/08, and 5/26/08.

Jurisdictional determination made by Bob Quebedeaux,
USACE, 3/23/08.

Map revised 5/30/08.



-  USACE Jurisdictional Wetlands (0.15 acres)
-  USACE Jurisdictional Waters of the U.S. (479 i.f.)
-  Non-USACE Jurisdictional Wetland
-  Temporary Impact Areas
-  Wetland Delineation Project Boundary
-  Wetland Test Pit

Page 76, Section 3.6.3.2 Environmental Consequences - Wetlands, Alternative 1 - Wetlands Impacts

TABLE 9. TEMPORARY IMPACTS TO POTENTIAL USACE JURISDICTIONAL WETLANDS

Site	Acres of Temporary Wetland Impact	<u>Temporary Impacts to Potential Jurisdictional Waters</u>
Site B	0.01	
Site C	0.02	<u>479 linear feet</u>
Site D	0.01	
Site E	0.00	
Site F	0.39	<u>.003 acres</u>
Total Wetlands and Waters	0.04 .42	<u>479 lf plus 0.0003 acres</u>

Page 77, Section 3.6.3.2 Environmental Consequences - Wetlands, Alternative 1 - Wetlands Impacts
In contrast, the proposed project would result in local to regional major beneficial impacts to wetlands.

Page 88, 3.6.4.2 Environmental Consequences - Special Status Species, San Francisco Garter Snake, 2nd paragraph

Adverse impacts may be local to regional, moderate to major, and “may affect / is likely to adversely affect” the San Francisco garter snake. However, as stated in the conclusion below, implementation of the mitigation measures and the Best Management Practices in Appendix E, will reduce these impacts to less-than-significant impacts to the species.

Page 88-89, 3.6.4.2 Environmental Consequences - Special Status Species, Mitigations [revised mitigations are included in the Mitigation Table in Appendix A]

- *No earthmoving or soil disturbing work shall occur in the vicinity of the “Bowl” or existing ponds or wetlands between November 15 and April 15, the breeding season for California red-legged frogs and the season when San Francisco garter snakes are inactive in their winter burrows.*
- *Vegetation in all construction areas will be progressively cut cleared by hand equipment to a height that would allow for a visual search of the snake of 4 inches and checked for presence of snakes prior to ground-disturbance and construction equipment or vehicles entering the sites. Once vegetation is cleared, a pre-construction survey for the San Francisco garter snake will be conducted in the impact area.*
- *Prior to construction near wetlands or ponds, exclusion fencing will be constructed and all rodent burrows in the construction area will be hand excavated until the burrows terminates or until a maximum depth of 30 centimeters in areas where soil or fill will be removed or placed. Exclusion fencing gates will be closely monitored throughout construction to ensure no snakes enter the area.*
- *A qualified biologist Biological Monitor will inspect for snakes and frogs underneath any vehicle that is parked for 30 minutes or more, immediately prior to moving the vehicle.*
- *Personnel who detect any suspected San Francisco garter snake or California red-legged frog on-site will immediately report their finding to a qualified biologist Biological Monitor for positive identification. Non-permitted personnel will not attempt to capture or move any snake or frog detected. If the qualified biologist Biological Monitor determines that the animal is not a San Francisco garter snake or California red-legged frog, the qualified biologist Biological Monitor may hand capture and move the animal to suitable habitat outside the construction area. If the qualified biologist Biological Monitor determines that the detected animal is a San Francisco garter snake or a California red-legged frog, or is unable to positively identify the animal, then the qualified biologist Biological Monitor will notify the permitted biologist for appropriate action.*
- *A biologist holding a valid Scientific Collection Permit from the U.S. Fish and Wildlife Service will*

be on call or on-site to handle any San Francisco garter snakes or California red-legged frogs encountered during pre-construction and construction activities. Only a holder of a valid Scientific Collection Permit from the USFWS will handle San Francisco garter snakes. California red-legged frogs will only be handled by a holder of a valid Scientific Collection Permit from the USFWS or a USFWS-approved biologist ~~Monitor~~.

- All excavated holes and trenches will be either covered at the end of the workday, ramped or escape boards will be placed in trench to allow the animals to escape. Trenches will be inspected each morning and late afternoon by the qualified biologist ~~Biological Monitor~~ as well as before the trench is filled. The permitted biologist will relocate any San Francisco garter snake or California red-legged frog individuals found.
- Wetlands will be monitored for invasive aquatic species and removal will be conducted when needed if found.
- Invasive non-native plant removal involving ground disturbance would be conducted as follows so that any San Francisco garter snakes that may be hiding in vegetation can escape unharmed. First, search each clump or patch thoroughly for snakes. If a San Francisco garter snake is found, disturbing it is likely to make it hide more deeply in the vegetation, therefore, leave the clump or patch alone and check it again on a later day. If no San Francisco garter snake is found, cut the vegetation manually 1 to 2 feet above ground level and search it again (carefully). If no San Francisco garter snake is found, the remainder of the clump or patch can be removed. Prior to removal of vegetation, the site will be surveyed for underground burrows. In those areas where no burrows are found, the plant may be removed using a weed-wrench or other digging tool.

Page 97, Raptors and Other Special Status Birds (Including Migratory Birds)

- If vegetation-removal work is anticipated during the bird-nesting season, vegetation shall be removed to a height of less than 8 inches prior to the nesting season (March 1st through July 31st) and maintained at height less than 8 inches throughout project activities to discourage nesting. If work is necessary during the nesting season, a qualified biologist must conduct a pre-project survey for nesting birds and determine that birds are not nesting within the project area. All pre-project surveys would be conducted by qualified individuals and coordinated with the GGNRA wildlife ecologist. If nests are found, appropriate buffers (where construction work could not occur) would be established around nest sites. Buffers would be maintained until birds fledged and young birds were mobile enough to move out of the area, or nests failed. Buffer size would be determined based on species and nest site characteristics and proposed construction actions in coordination with the ggnra wildlife ecologist. Project activities including vegetation removal, grading, earth movement, or other activities involving mechanized equipment shall not be conducted during the bird nesting season, from March 1 through July 31st, unless a qualified biologist conducts a pre-project survey for nesting birds and determines that birds are not nesting within the project area. All pre-project surveys would be coordinated with the GGNRA Wildlife Ecologist. To the greatest extent possible, these activities will be planned and conducted outside bird nesting season. If work is necessary during the bird-nesting season, vegetation shall be removed to a height of less than 8 inches prior to the nesting season (March 1st through July 31st) and throughout project activities to discourage the nesting of ground-dwelling bird species.

Page 99, San Francisco Dusky-footed Woodrat, Mitigation

***Mitigation Measure:** Prior to implementation of proposed project activities, conduct visual surveys within the Monterey pine and cypress groves on-site to determine the presence or absence of woodrat nests. If woodrat nests are located during this survey, avoid the nest(s) and establish a minimum protection buffer of 25-50 feet ~~buffer~~ around each nest depending on the characteristics of the site. Project activities requiring grading, mechanized equipment or vehicles, or large crews within the ~~25-foot~~ protective buffer should only occur during the non-*

breeding season (October-November) to avoid noise impacts to any breeding woodrats that may occupy the nest from December through September. If project activities cannot avoid impacting or removing the nest, then the nest(s) should be dismantled by hand prior to grading or vegetation removal activities. The nest dismantling shall occur during the non-breeding season (October-November) and shall be conducted so that the nest material is removed starting on the side where most impacts will occur and ending on the side where the most habitat will be undisturbed, which will allow for any woodrats in the nest to escape into adjacent undisturbed habitat. If young are encountered during nest dismantling, the dismantling activity should be stopped and the material replaced back on the nest and the nest should be left alone and rechecked in 2-3 weeks to see if the young are out of the nest or capable of being out on their own (as determined by a qualified biologist); once the young can fend for themselves, the nest dismantling can continue.

Page 107, Section 3.7.1.2, Archaeological Sites, last sentence

No ~~important historic or prehistoric sites or properties on or~~ eligible for the National Register of Historic Places were found that would be impacted by the Mori Point project. However, some areas of Mori Point were determined to be archaeologically sensitive.

Page 107, Section 3.7.2.1, Alternative 1, end of first paragraph

Therefore, no adverse impacts to cultural resources are anticipated, though the GGNRA will continue to monitor areas of previous historic significance during ground disturbing activities. To mitigate impacts to any undiscovered archaeological resource, the GGNRA will employ the following mitigation:

Mitigation Measure: The project team will consult with the GGNRA archaeologist well in advance of any work that will be conducted in archaeologically sensitive areas. If archaeological materials are recovered, funds must be identified as part of the project for preservation, cataloguing, storage, equipment, and materials needed.

Page 112, 3.10.2.1, Visitor Use and Recreation, Environmental Consequences, Alternative 1

Mitigation Measure: Hours of construction using heavy equipment will be limited and restricted between the hours of 8:00 p.m. until 7:00 a.m. and would not occur on weekends, ~~and established~~ Trails will be detoured rerouted during construction.

Page 120, under the left photo, The Point covered in wildflowers

Photo credit: Alan Grinberg

Page 125, Section 4.2, Regulatory Compliance, California Coastal Commission

GGNRA sent a letter to the California Coastal Commission on December 19, 2005 asking for a Negative Declaration Determination for the project under the California Environmental Quality Act (CEQA): in accordance with the Coastal Zone Management Act of 1972, as amended, Section 307c(1).

NPS RESPONSE TO PUBLIC COMMENTS

A public comment period was provided for the EA from February 22, 2006 through March 26, 2006. Forty-two comments were received from individuals, the GGNRA [Pacifica] Liaison Committee, Responsible Organized Mountain Pedalers (ROMP), Coastwalk, and the Coastal Conservancy. The paraphrased comments and the NPS responses follow.

Comment: Twenty-two (22) comments expressed a preference for Alternative 3 – All Multi-Use (greater access for bicycles). Among supporters of Alternative 3 was the Responsible Organized Mountain Peddlers (ROMP). The public rationale for supporting Alternative #3 included the following:

- Other uses, including biking, are a popular form of recreation for park users.
- Biking has low environmental impacts.
- The park is in an urban setting, therefore should be managed to accommodate forms of urban recreation rather than as a nature preserve.
- Other park models demonstrate the success of open access for biking.
- Opening more trails to bicyclists would decrease their density on any particular trail.
- Keep the Mori Point an urban park that allows mountain biking and that is in tune with the majority of the population.
- Biking is compatible with hiking; trails can be shared without conflict between users.
- Biking in the park provides a safer alternative to biking along busy streets, especially for children.
- Biking provides another recreational alternative for those who cannot sustain weight-bearing activities such as hiking due to disability.

Response: The NPS recognizes the popularity of bicycling in the Bay Area and the GGNRA's role as a National Park in an urban setting. Under the Preferred Alternative, the majority of trails, 2.26 miles (64%) will be multiple-use and will provide numerous opportunities for safe recreation for hikers, bicyclists, children, equestrians, and people with disabilities. This allows mountain biking to remain a viable way to enjoy Mori Point. Comments from bicyclists stated that bicyclists and hikers could share trails without conflict; comments were also received from respondents who describe feeling uncomfortable using the same trails as bicyclists. In order to accommodate those who prefer to hike without the perceived intrusion and dangers that trail sharing presents, the remaining 1.26 miles (36%) of trail will be pedestrian only.

This balance between multiple-use and hiker-only trails in Alternative 1 is the direct result of constraints on trail construction due to steep topography and the threatened and endangered species on site. For example, park staff investigated the feasibility of constructing switchbacks along the Peak Trail and along the CCT Coastal Connector in order to facilitate multiple-use. However, geological and trail construction experts advised that constructing steps would be more sustainable due to the steep and eroding substrate. The addition of steps makes these trails most appropriate for hiker-only use. Similarly, the construction of switchbacks along the Crest Connector Trail was deemed inappropriate due to the need to limit ground disturbance to protect the San Francisco garter snake and to avoid constructing new trail through native plant communities. Therefore, step construction, which limits bike access, was identified as the best alternative. Finally, the Crest Trail was considered for multiple-use, but would dead end at the hiker-only Crest Connector Trail to the east. Experience shows that dead-end trails do not succeed due to the creation of non-designated trails through habitat by those who do not want to turn back. However, the Crest Connector Trail will be reconsidered for multiple-use if trails are constructed in the future that would provide multi-use trail connections to the east and/or south of the site.

The Organic Act of 1916 provides the basis for management of lands in both urban and rural settings. The NPS has one set of Management Policies that do not make a distinction between national recreation areas in urban setting and other national parks, monuments, etc. The guiding principles for National Recreation Areas are the same as any National Park: to preserve unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The NPS strives to carry out this mission at Mori Point in a manner which allows current generations to enjoy the Park while adhering to this mission and NPS policies and mandates.

Comment: The GGNRA Liaison Committee expressed a preference for Alternative 2 – Limited Multiple-Use (least bicycle access) because:

- Hiker-only trails respect the uniqueness of the site. Mori Point provides habitat for one of the most critically endangered species, the San Francisco garter snake. Hiker-only trails reduce the chance that the species will be inadvertently run-over by bicyclists;
- Hiker-only trails reduce safety hazards and potential conflicts between park users;
- Hiker-only trails offer a serene environment within which to enjoy nature.

Response: There was much public support and comment for designating all trails as multi-use. There was also support for hiker only trails. The NPS believes that in light of the preferences and values expressed about the site, Alternative 1, the Preferred Alternative, provides the best balance of experiences Mori Point's different users. The current trail plan provides opportunities for hiker only trails that offer a serene park setting.

In addition, a goal of the plan was to protect the endangered San Francisco garter snake and threatened California red-legged frog. The NPS recognizes the concern regarding the impacts of recreation on the San Francisco garter snake and as such concludes that the increase in protected areas under the new trail plan will help support the recovery of these species. The entire strategy will be reviewed by the USFWS to ensure the proposed actions meet that goal to the maximum extent possible.

Comment: Ten (10) comments supported Alternative 1 (Preferred Alternative). Organizations supporting Alternative 1 included the Coastal Conservancy and Coastwalk. The rationales for comments received in support of the Preferred Alternative were similar to those supporting Alternative 2, above.

Response: The comments supportive of Alternative 1 (mixed multiple-use and hiker-only), Alternative 2 (limited multiple-use and hiker-only), and Alternative 3 (all multiple-use), reflect on-site observations and results from two different user surveys - people want different experiences at Mori Point. One study showed that 78% of people walked or ran while 21% biked at Mori Point. In another study, only 8.9% of people responded that they bike at Mori Point. Although the number of individuals who actually reported biking was very low, 32% of individuals valued biking as an "important, very important, or extremely important" experience at Mori Point. In the same study, the activities ranked in the top five as important at Mori Point were: 1) scenery and nature, 2) hiking and walking, 3) being with friends, 4) bird watching, and 5) beach activities. In light of the preferences and values expressed via observations, comments and user surveys, GGNRA determined Alternative 1, the Preferred Alternative, provides the best balance of experiences Mori Point's different users. Equally important, the balance between multiple-use and hiker-only trails in Alternative 1 is the direct result of constraints on trail construction due to steep and eroding topography and the threatened and endangered species on site.

Some respondents lauded parks where trails are all multiple-use (such as China Camp, Fremont Older, Annadel State Park, Arastradero, Wilder Ranch) but other commenters supportive of Alternative 1 stated that these parks have not been successful, and report feeling unsafe and imposed upon when sharing trails with bicyclists. In order to accommodate those who prefer to hike without the perceived intrusion and dangers that trail sharing presents, 1.26 miles (36%) of trail will be pedestrian only.

Comment: One comment expressed the viewpoint that native tree species should not be cut down and concern that the Park has pulled out 300 native pines. Two other commenters expressed support for the

tree management strategy as outlined in the EA: keeping large non-native trees and eliminating seedlings and saplings throughout the site.

Response: The conifers at Mori Point are Monterey pine (*Pinus radiata*) and Monterey cypress (*Cupressus macrocarpa*) are not native to this site. The native populations of these two species are near Monterey, CA. Therefore, the plant and wildlife communities at Mori Point evolved without these, or other, large tree species. Historic photographs show that conifers were only recently introduced to Mori Point. Since their introduction, these species have spread throughout the site. These species replace naturally occurring habitats that support native wildlife. Introduced conifer forests are not compatible with the protection of the San Francisco garter snake and the California red-legged frog because these species rely on wetland habitats and upland areas that are composed of a mixture of open grassland and scrubland. For these reasons, the GGNRA plans to confine the spread of Monterey pine and cypress at Mori Point. However, due to the high regard that people often have for trees, native or not, large, mature trees will not be removed. Instead, only small trees measuring less than 8 inches in dbh (diameter at breast height) will be routinely cut or pulled in order to stop the spread of groves beyond their existing footprint. This has been NPS practice at the site to date. All other trees will be left in place to grow old naturally and die, unless they are diseased, topple, or present a safety hazard. They will not be replaced and the forest will not be allowed to regenerate. All management actions at Mori Point so far have been, and will continue to be, in accordance with the guidelines spelled out in the EA.

Comment: One commenter requested that if the diseased trees onsite are to be removed, the NPS leave the trunks intact for woodpeckers and use felled limbs for mulch or wildlife habitat.

Response: To the extent feasible and compatible with other goals, the NPS will leave trunks intact for wildlife habitat.

Comment: The GGNRA Liaison Committee expressed concern about recreational impacts to snake survival, including but not limited to bicyclists and pets, and requests that a study regarding impacts of recreational use on the San Francisco garter snake be conducted at appropriate intervals, and that the Park Service implement any necessary changes.

Response: GGNRA recognizes the concern regarding the impacts of recreation on the San Francisco garter snake and believes that the drastic reduction in impacted areas under the new trail plan will help support the recovery of these species. The NPS will work with the USFWS to determine appropriate monitoring requirements. As stated in the Biological Opinion (BO) received from the U.S. Fish and Wildlife Service, the NPS will work with the USFWS to plan and initiate a visitor-use survey to assess the effectiveness of the new trail system in reducing off-trail effects to habitats and implement protective measures as needed.

Comment: One commenter requested the trail plan incorporate another trail connecting the Fairway entrance with the ridgeline directly, without the detour towards the ocean or further inland.

Response: The existing eroded connection between the Fairway entrance and the ridgeline will need to be closed because it would not be sustainable due to pre-existing erosion issues and steep grades. In order to accomplish another, more direct, connection to the ridge top, a new trail would need to be constructed through intact coastal scrub, where there is little pre-existing topographical or vegetation disturbance. During planning, the NPS considered constructing such a trail, but decided that the disturbance to native habitat, further fragmentation of intact habitat, increase in erosion potential, particularly in a landscape heavily scarred by human use did not

outweigh the benefits of another route to the ridge top. The alignment proposed in the Mori Point Restoration and Trail plan ensures the ridge can be reached by a number of other scenic routes.

Comment: The GGNRA Liaison Committee encourages the use of nonsynthetic materials in the construction of new trails. Two individual comments expressed concern that the trails would be paved.

Response: NPS endeavors to use natural, sustainable, or recycled materials in the construction of durable and low-maintenance trails and other site amenities. All materials will be reviewed for compatibility with the health of endangered species and other natural resources and will further adhere to design standards provided in the Park Site Furnishing Guidelines for “rustic” areas. No trails will be paved.

Comment: A commenter suggested that the trails be sustainably designed without the use of stairs.

Response: Geological and trail construction experts advised that constructing steps would be more sustainable due to the steep and eroding substrate.

Comment: One comment expressed concern that access to fishing sites would be limited.

Response: The trail alignments presented in all alternatives do not close any trails along the coastline. Access to fishing sites will not be changed.

Comment: One person requested that some trails have gradual grades and benches approximately every ¼ mile for older visitors.

Response: The project includes site furnishings such as benches. Some trails, such as Mori Road and the Upper Trail have gradual grades. Comment on the frequency of bench locations is noted and will be considered when benches are planned for installation.

Comment: In order to disperse the adverse impact of recreational use on Mori Point, the Liaison Committee urges the Park Service to include an emphasis on educational outreach that informs park users of alternative sites for recreational purposes.

Response: Kiosks will introduce the site’s habitat and natural values paramount situation and encourage appropriate use and a “leave no-trace” ethic. Wayfinding signs and presentations of nearby recreational opportunities may be included.

Comment: The NPS should include information on the former Ohlone site at Mori Point into information about the site.

Response: This information will be considered for inclusion in interpretive panels for the site.

Comment: One letter noted that the EA excluded paragliding without any foundation or explanation and that the launch and landing areas are outside the borders of the sensitive habitat areas as shown on Figure 16 of the EA. The comment continued that the USFWS noted that paragliding does not have any more negative impact than hiking. Finally, the letter stated that further evaluation of paragliding is required.

Response: Paragliding was eliminated from detailed study because GGNRA maps on file regarding the 2004-2005 paragliding permit had shown the landing area in the middle of “The Bowl” which is part of a Special Restoration Area with sensitive wetlands that provide habitat to the San Francisco garter snake. However, it is noted that paragliding was dismissed without a

diligent effort to assess whether the activity was appropriate in other areas of Mori Point that would not impact sensitive habitat. After further evaluation, the NPS determined that paragliding is a special park use that could potentially occur at the site and therefore should not have been dismissed as a potential visitor use activity. Applications for Special Park Uses at Mori Point may be submitted to the GGNRA Special Park Uses Group. Such activities would be located outside of habitat, restoration, and sensitive areas as defined in the EA and will be reviewed on a case-by-case basis. This change is noted above in CHANGES TO TEXT.

Comment: The EA stated that all decisions on dog walking were to be handled by the Negotiated Rule-Making Process. However, the GGNRA also stated that off leash dogs would not be allowed at Mori Point, making the EA appear disingenuous. Another comment stated that there seems to be no good reason to eliminate them from yet another area of the park.

Response: The statement in the EA remains valid: “Dog walking on site will be evaluated through an ongoing federally-sanctioned Negotiated Rulemaking Process.” (page 12) However, the EA did fail to mention that due to the endangered species at the site, off-leash dog walking will not be considered. According to the *Notice of Intent to Establish a Negotiated Rulemaking Advisory Committee* published in the Federal Register Federal Register / Vol. 70, No. 123 / Tuesday, June 28, 2005, “On-leash dog walking could be considered in areas with threatened and endangered species only if it is demonstrated that adverse effects or impacts are minimal and could be mitigated. New NPS lands that come under the management of GGNRA in the future will be evaluated for appropriate recreational uses, including dog walking, and any approved dog walking use will be consistent with the new special regulation for dogwalking in GGNRA.” The decision of whether dogs will be permitted on-leash at Mori Point will be decided as part of this Negotiated Rulemaking process and in the Environmental Impact Statement for the Dog Management Plan for the GGNRA. This change is reflected above in CHANGES TO TEXT.

Comment: One letter stated that the alternative trail plans do not offer any open space for recreation.

Response: The plan provides for a wide range of recreational uses. Use studies at Mori Point show that visitors come to Mori Point to hike/walk, bicycle, ride horses, bird watch, and enjoy the scenery and nature, and beach activities; the plan accommodates all of these uses. While people are encouraged to stay on trails, open space areas that are specifically closed will be limited and restricted to areas necessary for the protection of the SF garter snake and red-legged frog.

The below comments supported actions stated in the EA. The NPS will undertake these actions. These comments are noted for the record.

Comment: One comment supported the plan’s approach to the feral cat colonies.

Comment: Nine comments supported the goal of resource protection as the foremost concern at Mori Point. Particular points were supported preservation of the rich biological resources of Mori Point, of consolidation of social trails, limiting biking, ensuring that the Park is not “loved to death”, and striking a balance between human needs and biological conservation. There was also support for pond construction and preservation of grassland on site.

Comment: In order to preserve habitat, the GGNRA Liaison Committee strongly urges collaboration with the City and County of San Francisco to expedite in a timely manner construction of the boardwalk as described on page 28 of the EA.