



## Recommended Categorical Exclusion - DRAFT

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**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 Categorically 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 administrative record:

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

**Final Agency Decision:** *TBD after public review and comment*

**CE Approval and Decision to Implement:** *(To be completed after public review and comment.)* 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.

To be signed after public notification period  
Craig Kenkel, Acting General Superintendent  
Golden Gate National Recreation Area

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Date

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National Park Service  
U.S. Department of the Interior

Golden Gate National Recreation Area  
Date: 3/21/2017

## 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, Proposed Action, Impact Assessment,  
National Historic Preservation Act (NHPA) Section 106  
Compliance, Summary of 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. 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 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.

The proposed pilot overnight program will inform planning for a possible future expansion which would enable the PLI to better fulfill their mission by creating a pathway from outdoor adventures and college access, to meaningful employment and career opportunities. PLI is proposing 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. The action currently proposed for public review and comment is only comprised of the temporary pilot overnight program proposal 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 proposed 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 (WFM) in order to achieve new growth in both numbers served and outcomes desired. This proposed pilot program would 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 Fort Miley. With high demand for PLI's programs, this new option would 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 and the minimal infrastructure requirements needed to support the proposed use. PLI proposes to partner with groups they already serve to offer a 1-2 night stay in conjunction with other PLI programs, including the ropes course. These overnight opportunities would create more meaningful outdoor experiences and add value to PLI's goal of changing lives through adventure. To initiate this program, PLI would need to address bathrooms, potable water supply, park amenities (e.g., picnic tables, portable fire pit), and security.

### Objectives:

A successful project would:

- Meet the demand for programs.
- Increase 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 WFM, consistent with the goals of the 2014 General Management Plan (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 multifaceted expansion 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 NEPA Project Review /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. This draft document outlining the proposed action and impact analysis provides the public with sufficient information to comment on the proposal.

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. PROPOSED ACTION

PLI proposes to create and run a pilot program from a small group campsite that would accommodate up to 30 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, a portable fire pit, and sitting area (e.g., circle of logs). The proposed 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 2-4 person tents
- 25-35 groups per year
- 1-2 nights per group



The program would adhere to the following standards:

- All equipment would be packed-in at the start of each overnight session and packed-out at the end.
- The public would have free access to areas not designated for use by PLI; subject to existing opening and closing times.
- Acceptable noise levels, expected to remain under 85 dB.
- 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 proposes to operate this pilot overnight program in a similar manner.

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

- To reduce potential conflicts and impacts associated with exclusive use, PLI would 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.
- To allow evening visitors to enjoy the night views looking south along Ocean Beach, PLI would ensure placement of tents would not hinder public access to the overlook.
- To minimize noise and visibility to neighbors, tents would be placed adjacent to the trees along southern edge of lawn such that they would not be visible from the houses, and would help dampen sound.
- To minimize the impression of camping as a regularly authorized activity, PLI would 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.
- To inform the public of the nature of the programming occurring at West Fort Miley, PLI would 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 would be required and USPP would be made aware of all scheduled camping nights.
- To avoid potential adverse impacts and conflicts with wildlife and to increase sustainability, PLI would develop and submit to NPS a Waste Management Plan.
- PLI would 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 would be furnished with 6 overnight parking passes which PLI may furnish to program participants, including a designation of area overnight program participant parking may be confined to.
- PLI would ensure continued coordination and communication with the Veterans Affairs facility, notifying them of expected program dates.
- To avoid potential exposure to asbestos containing materials, PLI would ensure that the Battery Chester



gun pit, which is adjacent to the West Fort Miley lawn area, is off limits during any programming. PLI would ensure that program leads understand this and communicate with all participants.

- PLI would 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.
- Any campfires would be limited to a single portable fire pit, and would 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 action proposed by PLI. In summary, the NPS has preliminarily determined the actions proposed herein would not have the potential to cause significant adverse impacts, would not trigger any DO-12 §3.5 Exceptions, and would meet the requirements of a Categorical Exclusion (DO-12 §3.3) under NPS NEPA guidelines.

### **1) 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 Veterans Affairs facility adjacent. 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).

### **2) 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).

**A. 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 would 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 would 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 would be limited to trees which pose an imminent danger to visitors or immediate threat to park resources, and would 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 would be done in compliance with Pacific West Region Directive: PW-062 “Hazard Tree Management”, and would not have the potential to significantly impact the health or viability of the forest.
<b>Biological</b> Wildlife and/or Wildlife Habitat including terrestrial and aquatic species	None	N/A
<b>Cultural</b> Archeological Resources <i>Potential Buried Archeological Artifacts</i>	Potential	Issue: Ground disturbance from equipment staking.  Impact: No tent or equipment staking would be permitted per SUP conditions, and no other ground disturbance is proposed.
<b>Cultural</b> Cultural Landscapes <i>West Fort Miley</i>	Potential	Issue: Location of camping is on the northwest section of the lawn adjacent to West Fort Miley  Impact: No permanent impact. No visual impact between 2 hours after sunrise and 2 hours prior to sunset. An increased use of the area may decrease vandalism of the fort.

<b>Cultural</b> Ethnographic Resources	None	N/A
<b>Cultural</b> Museum Collections	None	N/A
<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 would occur from the proposed uses. Additional activation of the space and facility could decrease vandalism.
<b>Geological</b> Geologic Features	None	N/A
<b>Geological</b> Geologic Processes	None	N/A
<b>Lightscapes</b> Lightscapes <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 would create a safer visit for local residents, visitors, and program participants. A decrease in vandalism would also be 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 would 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 would be used temporarily for this overnight program. Currently this area is occasionally used for special events, but the specific area where camping would occur has less views of the ocean and would receive an increase in activation. A majority of the campers would be from under-served audiences who visit the PLI Ropes Course prior to camping. This would be the first camping experience for many urban youth who reside in the city.

<p><b>Socioeconomic</b> Minority and low-income populations, size, migration patterns, etc. <i>Minority and low-income populations</i></p>	<p>Potential</p>	<p>Issue: Increase in diverse populations which visit and use this location.</p> <p>Impact: 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. Proposed camping participants would participate in the Ropes Course during the day, and therefore be similarly diverse. This would 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>	<p>Potential</p>	<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 would 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>Soundscapes</b> Soundscapes <i>Local Soundscape</i></p>	<p>Potential</p>	<p>Issue: Sounds and noise from the overnight programming traveling within the immediate local area.</p> <p>Impact: There would be an increase of sound around sunset and sunrise, but as per all other SUPs, 85dB would 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 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.</p>
<p><b>Visitor Use and Experience</b> Recreation Resources <i>Available Activities and Supply</i></p>	<p>Potential</p>	<p>Issue: Increased recreational offerings for PLI participants, and availability of the area for continued public use and special use permits.</p> <p>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 would continue to be allowed, and would not be expected to conflict with the proposed PLI pilot overnight programs. PLI plans increase the recreational programming available to participants by having 2-3 camping trips (1-2 night duration per trip) per month during the 2 year pilot. See subsection G.3 “Issues and Concerns” below for additional detail and analysis.</p>
<p><b>Visitor Use and Experience</b> Visitor Use and Experience <i>West Fort Miley</i></p>	<p>Potential</p>	<p>Issue: Change in amount of visitor use and experience.</p> <p>Impact: PLI would have on site security during all overnight programming, and visitor experience would be expected to improve with better activation of the area. Daytime visitor use would be minimally impacted as described in the prior impact topic.</p>

<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

**B. 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 would be monitored. Any damage would be repaired.
<b>Change historic ground cover or vegetation?</b>	No	N/A
<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 would be removed within 2 hours after sunrise and not be placed on site prior to 2 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 would be expected to result in a reduction of illegal activities in the area, and increase public and employee safety. PLI would 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	N/A
<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 would provide additional recreational opportunity for PLI program participants, but could slightly reduce the access to the West Fort Miley area for the general public during the hours between 2 hours before sunset and 2 hours after sunrise during overnight programs in this pilot time frame. Limited additional overnight parking for program participants could 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>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 would 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 would be regulated, and any effects would be temporary and would 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 might be marginally impacted, but would only occur between 2 hours prior to sunset to 2 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 should be off limits. PLI would 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 would 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 would pack in all water needs initially, and could potentially 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 would 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 would not represent an approval of long-term change of use.
<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 would be allowed while programs are in operation. Signs would be removed after each overnight.

### 3) 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 would be limited from 2 hours before sunset to 2 hours after sunrise for between two to six nights per month, when PLI runs an overnight program. Furthermore, PLI would limit camping activities to the southern quadrant of the lawn, which would continue to provide space for other public use during those times. Otherwise no access would be changed, the public would continue to have full day use access, and would 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 would be allowed sole use of the West Fort Miley area for providing camping for their program participants under the conditions outlined in Section F. "Proposed Action". The public would not be allowed to camp in the area. The

public could potentially 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 would be allowed to drive a vehicle to the site for loading and unloading. The USS San Francisco Memorial parking lot could be used overnight by program participants. There are no other overnight uses in the area which would 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 and which can result in unsafe conditions for visitors.

Condition with Project: The NPS is hopeful that more active use of the area would help deter illegal uses and activities in the area. PLI is part of San Francisco State University, they take security of their staff and participants very seriously, and are working on a security plan for the proposed pilot overnight program. The currently intermittent homeless in the area are part of a larger city wide problem. Our park is working on a closer relationship with the city on this issue as there are other park locations that have similar issues. Security would 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 would continue all existing maintenance operations with no change in schedule. PLI would maintain the area before, during, and after program participants are present. PLI would 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 proposed actions to be within compliance requirements during implementation, the following cultural resource stipulations must 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

To be completed after a 30-day period of public review and comment.

## I. DECISION / IMPLEMENTATION PROCESS

This draft proposal and environmental compliance document for the Pacific Leadership Institute Overnight Program proposal is released to the public for a 30-day public review and comment period. The public has been notified of this document's availability by email, on the park website, and social media outlets. The public is encouraged to submit comments during the 30-day period using the project website at:

<http://parkplanning.nps.gov/PLIpilotcamping>

Or by mail to:

Golden Gate National Recreation Area  
Attn: Pacific Leadership Institute Overnight Program  
Fort Mason, Building 201  
San Francisco, CA 94123

Following the 30-day public review and comment period, the NPS will review and analyze the comments received. With consideration of the public's feedback, a final implementation decision would be made by the discretionary authority of the Superintendent.



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National Park Service  
U.S. Department of the Interior

Golden Gate National Recreation Area  
Date: 3/21/2017

## ATTACHMENT B

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### Map and Proposed Site Plan

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## ATTACHMENT B

### MAP & PROPOSED SITE PLAN

#### Maps of Area





## Site Plan



### Note:

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



National Park Service  
U.S. Department of the Interior

Golden Gate National Recreation Area  
Date: 3/21/2017

## 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:       Date: 12/19/16