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August 14, 2024

David Smith, General Superintendent  
Golden Gate National Recreation Area  
201 Fort Mason  
San Francisco, CA 94123

RE: Stinson Beach Parking Area Rehabilitation Project

Dear Superintendent Smith,

River Otter Ecology Project, based in Marin County, CA, engages the public in supporting conservation and restoration by linking river otter recovery to the health of our watersheds through research, education, advocacy, and community science. River otters, although not a protected species, are sentinel apex predators that use every part of watersheds, from headwaters to ocean. Their presence and success are important indicators of ecosystem function and environmental health. For more than twelve years we have conducted intensive research on river otter populations within Golden Gate National Recreation Area. Our comments reflect our dual role as scientists working to understand the ecosystem function of the park's natural resources, and as members of the public on whose behalf these lands and waters have been entrusted to the care of the National Park Service.

The Purpose and Need statement in the recent Project Civic Engagement 2024 document clearly states that the purpose of the project is to "...provide for continued safe and sustainable visitor access to Stinson Beach..." Similarly, the Project Goals are confined to maintaining and adapting park facilities in order to maintain visitor access. These stated purpose and goals of the project are appropriate and necessary given historic and foreseeable future damage to park facilities from storms, wave run-up, and flooding.

Subsequent sections of the document, however, introduce a new objective: reducing flood risks to downstream private property owners. This objective is entirely inappropriate for a

National Park Service (NPS) project. Specifically, there appears to be a trade-off between the design, size, and capacity of the overflow channel, and maintaining existing parking capacity for visitor access. It would be contrary to the NPS's mission and authority to reduce visitor access in order to increase the capacity of the overflow channel for the benefit of private landowners downstream of park facilities.

We recognize that there may be incidental benefits to downstream private landowners from a project designed solely for the protection and enhancement of park facilities. Nevertheless, NPS should make clear that protecting downstream landowners is not a purpose, need, or goal of the project.

Thank you for considering our comments.

Respectfully,

A handwritten signature in cursive script that reads "Megan Isadore".

Megan Isadore  
Executive Director  
River Otter Ecology Project