

Appendix A

Hybrid Alternatives

Except as amended in the attached alternatives, CFDG supports modified Alternative A (No action -the 1979 Pet Policy) for all areas with the addition of new lands in San Mateo and Marin counties, clearer rules, better design (better and more signage and physical barriers and cues), a robust educational outreach program and better partnerships with local governments and community groups.

**GGNRA's draft EIS/draft Dog Management Plan
Supplemental Comment on Crissy Field
May 30, 2011**

VIA E-mail

This is a supplemental letter to accompany our comment letter which Crissy Field Dog Group hand delivered to your office on May 27, 2011 which will provide additional rationale and explanation to support our recommendations in Appendix A of that letter for Crissy Field.

Background: Crissy Field Environmental Assessment

The GGNRA released the Crissy Field Environmental Assessment (CF EA) in 1996, which found a Finding of No Significant Impact (FONSI) after going through an extensive five-year public involvement process. In the CF EA, the GGNRA increased the "voice command off leash dog walking" area from 38 to 70 acres at Crissy Field. In the CF EA, the GGNRA identified "dog walking" as a popular and valued activity at Crissy Field" (Page 2-30) and "would be a beneficial impact on recreation opportunities for dog enthusiasts" (Page 4-11).

Current zones -- Areas that were identified in the CF EA Proposed Action for "Allowable area for off leash dog-activities" included East Beach, Central Beach, the Promenade, the Grassy Airfield, and the beach east of the U.S. Coast Guard station.

Moreover, the promenade had very limited wheelchair access before the restoration and a concerted effort was made by the GGNRA to "make the entire site accessible, ramps added at boardwalk, overlooks, picnic areas, promenade" (Page 10) to provide accessibility for people with disabilities. And many older citizens walk their dogs off leash here as it is a level surface and is easier to walk on than the beach areas.

Designed for compatibility with restoration -- In addition, Crissy Field was intentionally restored, designed and constructed in a way that is complimentary for off leash, voice control dog walking. For example, on Page 2-23, the Proposal included the development of a 20-acre Tidal Marsh. "The tidal marsh was designed with a vegetated buffer zone ranging from 30-50 feet in width along the north side to 50-200 feet width along the south, east and west shoreline. This buffer consists of dune scrub species, which create a dense buffer between humans and wildlife as well as to provide upland habitat associated with the tidal marsh. Barrier fencing set within the vegetation deters dogs, cats, and visitors from getting into the marsh and disturbing wildlife. ...And there are two eastern overlooks that separate the promenade by fencing, barrier walls and a self closing gate to increase public safety and to ensure that off leash dogs do not have access to these areas."

Western Snowy Plover protection -- Since the CF EA, the GGNRA designated the West Beach (the beach east of the U.S. Coast Guard Station) a Wildlife Protection Area (WPA)

in 2006 to protect the federally threatened Western Snowy Plover who rests there for a portion of the year. There is a seasonal restriction in place that currently allows for dogs to walk on the water's edge on leash and for approximately two months, dogs may be off leash under voice control.

As you are aware, CFDG has worked closely with GGNRA staff and the Golden Gate Audubon Society in developing and sustaining an educational outreach program to protect the Western Snowy Plover for ALL visitors since 2006.

Cleanup -- As another element of our efforts to partner with GGNRA to protect the area's natural resources and visitor experience, CFDG provides thousands of doggie bags every year, which are distributed in the 17 dispensers at Crissy Field by CFDG volunteers on a DAILY basis. Every day is a clean up at Crissy Field for us.

Supplemental Comments

After carefully reviewing the GGNRA draft Plan/draft EIS, we were extraordinarily surprised by the preferred alternative for Crissy Field, which would drastically reduce the amount of off leash, under voice control areas without a clear technical basis or explanation for the proposed variance from the analysis in the CF EA.

This DEIS does not provide any substantial new empirical or analytical information that would support changing the conclusions and recommendations in the CF EA.

Visitor use – Our recommended alternative (Appendix A) is based on two facts, one of which is stated in the draft Plan/DEIS, and one of which is indirectly acknowledged but not analyzed in the draft Plan/DEIS.

The first fact is that visitor use has remained relatively stable for the past 20 years and is not projected to increase significantly in the next 20 years. Therefore, the CF EA remains a sound foundation for designating zones appropriate for off leash dog walking at Crissy Field.

The second fact is that some recreational uses have intensified at Crissy Field even if overall Recreation Area visits have remained and will remain relatively stable for the foreseeable future. Those uses are mainly special events and bicycle use, with some additional types and diversity of waterborne recreation. The impacts of these uses, particularly on Crissy Field's beaches and the grassy field, need to be rigorously studied and integrated alternatives explored to achieve a fair balance that maintains and preserves traditional uses such as off leash dog walking.

As our other comments have explained in some detail, the impacts of use by people relative to the presence of people with dogs, and the consequent impacts and causes of any impairment of the integrity of the natural resources, have not been analyzed in the DEIS and do not provide a basis for the severe reduction in off leash dog walking area at Crissy Field in GGNRA's current preferred alternative in the draft Plan.

For example, Page 71 of the DEIS asserts: "Particularly on nice days, the high level and variety of visitor uses have resulted in conflicts, including intimidation, dogs knocking people over, dog-on dog fights and dogs biting people". We have looked through this 2,400-page document, and have found nothing to substantiate this anecdotal assertion. Examination of the enforcement data summary table in Appendix G of the DEIS (Page G-1 to G-2) frequently cited in the DEIS, indicates does not support this assertion and indicated limited problems (see Appendix C of CFDG comments).

CFDG is not suggesting that conflicts never occur, whether among human visitors or among people and dogs. As noted above, CFDG understands that there are several hundred special events at Crissy Field totally thousands of people who normally would not go to Crissy Field, as well as the safety hazard by bicyclists on the promenade. There are solutions that need to be examined and incorporated into the proposed plan, such as providing bicyclists with a clearly signed alternative route (and speed limit) in the bike path along Mason Street to access Crissy Field. We are likewise willing to explore reducing potential conflicts and improving access for off leash dog walkers relative to the promenade.

Clear rules and signage – Our recommended plan include better signage as well as effective outreach and education proposed by GGNRA. For example, CFDG is not aware of kind of signage ever that the GGNRA has posted designating "Voice Control" areas for dog walking at Crissy Field. The only signage that has been posted is for the WPA at West Beach to protect the Western Snowy Plover, which CFDG supports.

In the CF EA, the Grassy Field (restored airfield) was designed and constructed for "active daily outdoor recreational use, including off leash dog walking" and "the airfield surface was vegetated with red molate fescue grass, a variety that poses a low potential for invasiveness to adjacent dune areas"(Page 2-13). The Grassy Airfield was designed not to allow traditional sporting events (such as soccer, ultimate frisbee, etc.) at Crissy Field.

The draft Plan/DEIS states that dogs contribute to soil erosion on the east portion side of the Grassy Airfield (Pages 364 and 365) but there is no specific documentation and a recent inspection (May 2011) by this author found no visible signs of erosion as described in this document and it is unclear how any dog would be able to create such a disturbance as, most, if not all dogs, run and play on top of the Grassy Airfield.

And one other point that needs to be conveyed is the fact that according to the GGNRA's PEPC website regarding the GGNRA's new General Management Plan (GMP) Newsletter #5, dated Summer 2009, states that **"the new plan will not revise decisions made in recent management plans for the Presidio, Crissy Field, Fort Point or Fort. Baker"**. Simple logic should prevail that the Crissy Field Environmental Assessment will stand as is and 70 acres of off leash dog walking under voice control remains in place as was approved by the GGNRA/NPS. Clearly there is a discrepancy between the GGNRA's draft Dog Management Plan/DEIS and the new GGNRA GMP

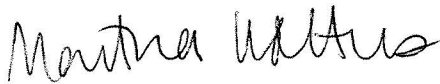
Conclusion

The only significant development identified in the draft Plan/DEIS since the CF EA has been the designation of the Western Snowy Plover Wildlife Protection Area. The continuation of the current management approach is being effective, as reflected in the draft Plan/EIS.

CFDG notes that the completion of the marsh restoration project proposed in the CF EA demonstrates that good urban and environmental design can protect diversity of visitor use and maintain off leash dog walking (along with voice control requirements).

.The other development since the CF EA, not yet analyzed in the draft Plan/DEIS, is the increased frequency and intensity of special events and some increased recreational uses. Rather than reducing off leash recreation from approximately 70 acres to Crissy Field now to approximately 20 acres of Crissy Field under the draft Plan – effectively assuring conflicts by concentrating use and therefore setting up a complete ban – the impacts of these uses should be examined in the framework of the CF EA to formulate a fair and balanced plan.

Sincerely,

A handwritten signature in cursive script, appearing to read "Martha Walters".

Martha Walters
Chair, Crissy Field Dog Group

May 30, 2011



IN REPLY REFER
TO:

United States Department of the Interior

NATIONAL PARK SERVICE
GOLDEN GATE NATIONAL RECREATION AREA
FORT MASON, SAN FRANCISCO, CALIFORNIA 94123

A--18

February 24, 1979 xw46

GOLDEN GATE NATIONAL RECREATION AREA ADVISORY COMMISSION

APPROVED GUIDELINES FOR A PET POLICY - SAN FRANCISCO AND MARIN

COUNTY (MUIR BEACH & SOUTH)

1. DEFINITIONS:

a. "Unmanaged" dogs and cats

(1) Feral dogs and cats. Those dogs and cats having escaped domestication and become wild.

(2) Those dogs not supervised by their owners.

b. "Managed" dogs: Those dogs under control of their owner at all time's. This control may be by voice or by leash. The criterion is that the dog may not harrass any person or animal.

c. Voice or leash control: This is a flexible system. The success of such a system is dependent upon the willingness of visitors and local residents to cooperate with GGNRA personnel, and the willingness of GGNRA personnel to manage dogs, people and wildlife situations; to enforce regulations; and to cite violators.

2. GENERAL POLICY:

a. Unmanaged animals are not allowed in GGNRA. Every effort should be made to apprehend "unmanaged" animals because of potential danger to visitors and wildlife. (Exception: "Cat Colonies") The Code of Federal Regulations (CFR 2.8 (d) states: "Dogs, cats or other pets running at large and observed by an authorized person in the act of killing, injuring or molesting humans or wildlife may be disposed of in the interest of public safety and protection of the wildlife." If the dog's owner is found, the owner should be cited and fined. If the dog's owner cannot be found, the dog should be sent to the local humane Society.

b. Licensing laws. If a person and a dog come from San Francisco or Marin County, the dog must have the appropriate license. If the person and dog come from out-of-town, the dog must conform to licensing practices where the dog resides.

Implementation of these laws should conform with regulations to be developed by the National Park Service Field Solicitor's office (attorney)- They should be posted in appropriate places throughout the park.

POLICY - MARIN COUNTY

Advanced Dog Training Area. That portion of former Whitegate Ranch bounded by Panoramic Highway, State Route 1, and Mt. Tamalpais State Park, and southwest of Panoramic Highway is designated as a dog training area for advanced training. Use is restricted to owners and dogs which have successfully completed basic obedience training and are in the process of advanced obedience or special skills training. Trainers utilizing this area should identify themselves by wearing a fluorescent orange armband. Use of the area by dogs not in advanced training will be considered a violation of park regulations.

Dog Run Areas. Pets on leash or under voice control are permitted in the following areas: Rodeo Beach at Fort Cronkhite

Muir Beach

4 Corners tract above Mill Valley bounded by State Route 1,
Panoramic Highway, Sequoia Valley Road and Homestead Valley
area

Trails. Pets are permitted on the following trails either on leash or under voice control:

1. Coast Trail, Golden Gate Bridge to junction of Wolf Ridge Trail (Hill 88) Loop trail from parking area up to Pacific Coast trail to paved road near Battery Townsley and return via paved road.
3. Wolf Ridge Trail between Coast Trail and Miwok Trail
4. Miwok Trail between Wolf Ridge Trail and Coast Trail, Fort Cronkhite.
(Trails 1, 3 and 4 provide a loop trail, also known as the Wolf Ridge Loop in "Guide to Golden Gate National Recreation Area" by Dorothy Whitnah, pp. 100-103.)
5. Oakwood Valley Road to Alta Avenue.** (see below)
6. Alta Avenue between Marin City and Oakwood Valley.

Pets on Leash. Pets are permitted while on leash on the following trails: 1. Coast Trail between Hill 88 and Muir Beach 2. Miwok Trail between Tennessee Valley parking area and State Route 1.

Pet owners are responsible for the actions of pets in all areas where pets are permitted. Owners who allow pets to engage in fighting, excessive barking, chasing or disturbance of wildlife., running at large beyond effective voice control or other inappropriate behavior will be considered as being in violation of park regulations.

No dogs will be allowed in Muir Woods, Audubon Canyon Ranch, Stinson Beach, and in areas where state park regulation conflicts will arise. The Committee will consider the area near Stinson Beach for dog access at the time northern Marin portions of the National Park Service are considered.

There are existing routes to GGNRA from the City of Sausalito which are not readily accessible to residents wanting to hike with their dogs. When future access routes are developed, however, these guidelines will be adjusted to incorporate them.

<u>Fort Funston</u>	-No restrictions (dogs under voice control).
<u>Ocean Beach</u>	-No restrictions (dogs under voice control) except that on crowded days, in the seawall area between the Cliff House and Golden Gate Park, visitors may be asked to leash their dogs or move south to less crowded areas.
<u>Sutro Heights</u>	-Dogs on leash with "Please pickup dog litter" signs.
<u>Lands End</u>	-No restrictions. (dogs under voice control).
<u>West Fort Miley</u>	-No restrictions (dogs under voice control) with "Please pick up dog litter" signs.
<u>East Fort Miley</u>	-No restrictions .(dogs under voice control). Reconsider after renovation of parking area.
<u>Phelan Beach</u>	-No pets.
<u>Baker Beach</u>	- <u>North beach area</u> : No restrictions (dogs under voice control). <u>South beach area</u> : No pets. <u>Picnic area/Parking lot</u> : Dogs on leash at all times.
<u>Fort Point</u>	-No pets.
<u>Golden Gate Promenade/ Crissy Field</u>	-Signs at entry points to read "DOG OWNERS - Your dog must be under voice-control at all times and on leash in parking and picnic areas."
<u>Fort Mason</u>	-Dogs on leash with "Please pick up dog litter" signs
<u>Aquatic Park/ Victorian Park</u>	-No dogs on beach. Dogs on leash elsewhere with "Please pack up dog litter" ^{4H} signs.
<u>Historic Ships</u>	-No pets.
<u>Alcatraz</u>	-No pets.

CAT COLONIES:

Existing cat colonies on San Francisco GGNRA lands will remain, and are specifically exempted from feral animal policy. We ask for long-term cooperation among the public, the SPCA. and the CGNRA to upgrade cleanliness and insure freedom from disease.

Note: Guide dogs for the blind are exempt from all restrictions.

Approved Jan 10.. 1979



SAN FRANCISCO
SPCA

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May 26, 2011

Frank Dean, GGNRA Superintendent
Building 201, Fort Mason
San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement Comments
Need for Adequate Compliance-Based Adaptive Management Program

Dear Mr. Dean:

Eco-Dog is a coalition of San Francisco Bay Area based organizations which promote the co-existence of responsible off-leash dog recreation with other forms of outdoor recreation. We support the protection of GGNRA's natural resources. This growing coalition is currently comprised of, but not limited to, the San Francisco SPCA, SF PAWS, Crissy Field Dog Group, Fort Funston Dog Walkers, Marin Humane Society, Marin Unleashed, Montara Dog Group, and Pacifica Dog.

We believe that responsible dog ownership is entirely compatible with environmental stewardship. Thousands of guardians and their dogs use the park each day. Most are responsible and keep dogs under control. The community, including dog walking groups and the SF SPCA, has come together to create numerous resources and initiatives to encourage responsible dog guardianship. By encouraging responsible guardianship – and enforcing the law against the small minority that are irresponsible – we can protect the GGNRA's environment without the need to overcrowd dog walking into an ever-smaller portion of the Recreation Area.

We agree on the need for clearer rules and compliance with the rules. However, the GGNRA's initial, current proposal in the event of "noncompliance" with its rules needs work and does not engage the community to find solutions. The draft/DEIS proposal indicates that if noncompliance is observed, "...the area's management would be changed to the next more restrictive level of dog management. In this case, ROLAs [regulated off-lead areas] would be changed to on-leash dog walking areas and on-leash dog walking areas would be changed to no dog walking areas. This change would be permanent." This approach unnecessarily punishes responsible dog guardians for poor behavior by a small minority. That no area could ever be changed to less-restrictive rules, such as when compliance is good and environmental protection needs are reduced, is one-sided and unfair.

As the Eco-Dog sponsor, the San Francisco SPCA encourages the GGNRA to develop its draft compliance-based approach into an adequate adaptive management program, as a common element to all alternatives. Eco-Dog has carefully reviewed and used the approach proposed in the draft Plan/DEIS as the starting point for recommending a framework for a compliance-based adaptive management program (enclosed).

Eco-Dog and San Francisco SPCA look forward to discussing these recommendations with you, as you develop the final Plan/FEIS. We stand ready to be part of the solution. We ask GGNRA staff to build a conservation partnership with the community for the effective and long-term preservation of dog walking recreation and natural values in the Golden Gate National Recreation Area.

Sincerely,

A handwritten signature in dark ink, appearing to be 'J. Scarlett', written over a circular stamp.

Jennifer Scarlett, D.V.M.
Co-President

A handwritten signature in dark ink, appearing to be 'Jason Walthall', written in a cursive style.

Jason Walthall
Co-President

cc:

Eco-Dog
Sen. Diane Feinstein
Sen. Barbara Boxer
Rep. Nancy Pelosi
Secretary Ken Salazar
NPS Director Jon Jarvis
Mayor Ed Lee
Supervisor Scott Wiener

Summary of Compliance-Based Adaptive Management Program Framework

The GGNRA is to be commended for trying to develop an adaptive management approach to the Dog Management Plan so that the final plan will be sufficiently flexible to deal with changing conditions. An adequate compliance-based management plan developed with public participation, as encouraged by recent CEQ guidance on mitigation and monitoring, is fundamental to the long-term success of the dog management plan.

The current initial draft compliance-based approach (draft Plan/draft EIS, pages 63-67) should be further developed and improved to provide an adequate adaptive management program that articulates:

1. Clearer objectives related to protection of the resources established in the GGNRA enabling legislation;
2. Clearer methods for objective monitoring;
3. Appropriate triggers for management responses, and management responses based on evaluation of monitoring data and related to protection of these resource; and
4. Public information and meaningful participation in the above process.¹

We believe we can build on this compliance-based framework to further develop the adaptive management approach – consistent with NPS and CEQ guidance – to create a plan that helps dog walkers to “do the right thing” as well as protect the natural, cultural and recreational resources in the GGNRA.

The main areas where our comments will suggest further specificity and development of the compliance-based adaptive management approach relate to:

- Providing effective outreach and education as part of the program start-up and primary management response.
- Allowing, in appropriate circumstances based on monitoring results, a third tier of impartial technical review related to impact on resources where proposed management responses restrict or result in closures.

¹ “Public involvement is a key procedural requirement of the NEPA review process, and should be fully provided for in the development of mitigation and monitoring procedures. Agencies are also encouraged, as a matter of transparency and accountability, to consider including public involvement components in their mitigation monitoring programs. The agencies’ experience and professional judgment is key to determining the appropriate level of public involvement. In addition to advancing accountability and transparency, public involvement may provide insight or perspective for improving mitigation activities and monitoring. The public may also assist with actual monitoring through public-private partnership programs.” CEQ final Mitigation and Monitoring guidance, (January 14, 2011), p. 13. Although this final guidance was issued after the draft Plan/draft EIS was prepared, it should be helpful in the preparation of the final Plan/final EIS.

- Allowing, in appropriate circumstances based on monitoring results, additional access for recreation with dogs where significant adverse impacts are not probable or where compliance or conditions have improved.

The framework is built on the initial approach proposed in the draft Plan/draft EIS, coupled with the outreach and education and partnerships components (briefly discussed on page 63 of the draft Plan/draft EIS), which should also be incorporated into the adaptive management program. The rationale for the tiered management response is noted at the end of this summary.

Public education, outreach and community partnership

The proposed “compliance-based” approach has potential to work, if it is improved to include public education and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. This could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

In addition, the GGNRA should develop a true adaptive management plan with a robust public educational component as part of the primary management response that would include local animal welfare organizations such as the San Francisco SPCA, Marin Human Society and the Peninsula Humane Society/SPCA. In part, these groups could provide training for dog owners as part of the startup of the program and provide educational advice about how to be a responsible dog owner.

Tiered management response

Primary management response (Tier1): triggered by observation of non-compliance; focus is on improving compliance with education, outreach, training.

Secondary management response (Tier2): triggered by measurement of non-compliance over time; focus is on further restrictions (voice control to on-leash, on-leash to no-dog).

Third management response (Tier3): triggered when an area is to be closed to dogs, or newly opened to dog access; focus is on impact measurement.

In the draft Plan/ DEIS, the proposed compliance-based approach relies on a surrogate indicator of adverse environmental impact and unacceptable impairment of Recreation Area resources – namely, an overall percentage of compliance with rules based on observations of noncompliance. If that percentage falls below 75%, access becomes increasingly restricted (secondary management response).

As with any surrogate indicator, it is useful and administratively efficient, but does not necessarily provide an accurate explanation or picture of environmental conditions. The ultimate goal is not compliance *per se*. The ultimate goal is the preservation of natural, scenic, cultural

and recreational values. Compliance to the rules by visitors is presumed to accomplish this goal, but management actions that would result in closure need to be measured against this goal.

An impartial review available to the public that is related to actual impacts and the integrity of the resources in the area in question would provide the necessary basis for a decision on the management response. This should not require a new EIS or re-open the EIS process, because it is implementing an impact-based adaptive management plan adopted as a mitigation measure in this EIS process. This third tier review, triggered in appropriate circumstances as described in the framework, has been used in other successful adaptive management programs (including successful nature resource adaptive management programs that have had more than 20 years of experience).

Compliance Based Adaptive Management Program Detailed Outline

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Definitions

An area is a unit of the GGNRA; there are currently 21 areas, and new areas are added to GGNRA from time-to-time.

A zone denotes a type of use allowed in an area (on leash, voice control, or no dogs). An area may have more than one zone.

Introduction

There appears to be support from diverse interests, including the recreational community, that:

- dog owners need to know the rules to be able to follow them;
- clearer rules and signs (or other physical aids) are needed (without cluttering the landscape);
- education is a key component to protecting GGNRA's resources and respect for visitors, which is the purpose of the rules; and
- the ability to continue to bring animals into GGNRA is related to compliance with the rules.

In short, there is general agreement that the success of the dog management plan depends on dog owners knowing and following the rules. Because success cannot be known until this updated dog management plan goes into effect, GGNRA is proposing an "adaptive management program" to measure success and, if substantial problems occur, to take management actions to address those problems.

The compliance-based adaptive management strategy has been designed to encourage compliance with sections of the Code of Federal Regulations (CFR) applicable to dog

management, and to ensure protection of recreation area resources, visitors and staff. It will provide the framework for monitoring and recording observed noncompliance with the applicable sections of the CFR, including the new 36 CFR Part 7 special regulation, and will guide use of park resources to address those violations. Noncompliance with federal regulations related to dog management will be met with a range of management responses designed to assure protection of GGNRA's resources and values.

The basic purpose of the compliance-based adaptive management program is to achieve compliance with the rules, take action to improve compliance if substantial problems are observed, and identify areas or zones that may need to be closed or that could be opened based on objective monitoring data.

The adaptive management strategy is based on implementation of the common elements described earlier, including guidelines for ROLAs, outreach and education about the rules and about dog owners' responsibilities to conserve GGNRA's resources and values, and partnerships with local governments and stakeholder groups in the outreach and education components.

The adaptive management program articulates:

1. objectives, sometimes called desired outcomes;
2. methods to measure progress toward meeting these objectives, which use observed noncompliance as the principal indicator of success;
3. triggers for taking further actions if problems are observed; and different levels of management responses (if there are problems)

The monitoring will be performed by qualified, impartial individuals, and the results will be publicly available and reviewable. In order to increase certainty for the public and administrative efficiency for the GGNRA staff, the types of management actions will be identified in the adaptive management program; however, site-specific problems identified in the monitoring may involve different management responses at different GGNRA areas to meet the objectives of the program.

Because non-compliance does not necessarily cause adverse environmental impacts, the adaptive management program includes provision to review whether dogs are causing an unacceptable impairment in circumstances where the proposed management action would close access to a zone altogether (this would not trigger a new NEPA review, because it is implementing the adaptive management program under an adopted plan and EIS).

This proposed compliance-based adaptive management program includes an 18-month "start-up" period, described in the Secondary management (Tier 2) response section. The start-up period will focus on outreach and education, in partnership with the community, in order to achieve the program's stated objectives. This community partnership on outreach and education will continue as part of Primary management (Tier 1) response during the implementation of the program.

This compliance-based adaptive management program does not have a pre-defined duration for several reasons. Compliance needs to be maintained on an ongoing basis. It is not possible to predict the results of the monitoring and management responses prior to implementing the program. It is assumed the program will be carried out for a four-year period. The need for continuing the program in its entirety or in specified areas and zones will be periodically evaluated by GGNRA in consultation with the adaptive management oversight team.

Adaptive Management Oversight Team

A small adaptive management oversight team, composed of representatives from local government, environmental and recreational communities will review the monitoring results and advise GGNRA staff on improving monitoring methods and refining appropriate management responses as experience is gained with the program. The adaptive management oversight team, GGNRA staff including law enforcement officers, monitoring personnel, and other participants as appropriate will meet at least quarterly and hold one annual workshop to review the past year's monitoring results and management responses and recommend any improvements in the adaptive management program to GGRNA. The public would be able to attend the workshop.

Objectives/Success Criteria

The GGNRA mission statement in brief is "the preservation, unimpaired, of the natural and cultural resources, and scenic and recreational values, of the park for present and future generations to enjoy." (see draft Plan/draft EIS, page 9).

The overall program goal is to accomplish this mission by providing for a diversity of visitor experiences in GGNRA, including dog walking on or off leash in designated areas, as long as the integrity of GGNRA's natural resource is conserved and this recreational use does not destroy the scenic beauty and natural character of the area.

The specific objectives are as follows (subject to exceptions in the rules for guide dogs, law enforcement dogs, etc.):

1. A dog owner or walker will not allow a dog in zones where dogs are prohibited, in order to respect a non-dog visitor experience or protect natural resources from unacceptable impacts caused by dogs disturbing wildlife or land and water bodies.
2. A dog owner or walker will place their dog on a 6-foot or shorter leash in zones where dog are allowed on leash.
3. A dog owner or walker will have a dog under sight and voice control and meet the other requirements of a ROLA where dogs are allowed off leash, principally to respect other visitors, not disturb soil or plants, respect signed natural resource protection areas, and control dogs from chasing wildlife.

4. A dog owner or walker will promptly take action to control a dog as needed to meet the above objectives.

Monitoring and Evaluation

The basic monitoring methods and approach are explained in this section. A more detailed monitoring plan will be developed to guide compliance monitoring, data management, and reporting.

Site specific monitoring

The monitoring will be performed on a site specific basis. All areas addressed by the dog management plan will be subject to monitoring. An area is a unit of the GGNRA; there are currently 21 areas, and new areas are added to GGNRA from time-to-time. A zone denotes a type of use allowed in an area (on leash, voice control, or no dogs). An area may have more than one zone.

Monitoring Timing and Baseline

Monitoring will begin with plan implementation, or soon thereafter. Starting with the implementation of the dog management plan, months 1-3 will be a public education period, and in months 3-6 the monitoring strategy will be tested. During months 6-18, a baseline of numbers and rates of visitors with and without dogs, numbers of dogs per visitor, type of use (on-leash or voice control) and noncompliance with regulations (includes noncompliance observed but not resulting in citations) will be established.

After this baseline has been established, monitoring efforts may be prioritized, with the park reducing the frequency of monitoring in low use or high compliance areas to focus on areas with high use or low compliance as needed. [Note: Some form of baseline information relating to impacts needs to be developed as well to inform later response actions if needed.]

Monitoring will continue in all areas for at least 4 years. However, all areas addressed in the dog management plan will be periodically monitored for changes in baseline to reprioritize monitoring as needed. Park management responses will focus on areas with demonstrated noncompliance with the regulations, as described in the primary management response section below. Monitoring will inform park management and law enforcement when, where, and how to prioritize responses to noncompliance.

Triggers and Management Responses

There are three tiers of management actions. Each tier has a different trigger, and each tier has a progressively more limited range of management actions associated with it.

1. **Primary management response (Tier1)**– this is triggered when noncompliance is *observed*; management actions are generally directed toward education and improving compliance.
2. **Secondary management response (Tier2)** – this is triggered when substantial noncompliance is measured (compliance falls below 75% as described below); management actions are directed toward more restrictive levels of dog management until good compliance is achieved.
3. **Access assessment and response (Tier3)** – this is triggered when an area is proposed to be closed or opened to access by dog walkers; management actions are directed toward assessing whether noncompliance is actually impairing natural resources (in the case of proposed restrictions on dog walking access in an area or zone) or whether increasing access in a zone or area with good compliance is likely to substantially impair natural resources. This may also be triggered during the secondary management response as noted below.

Primary management response (Tier1)

When noncompliance is regularly *observed* at an area, NPS would weigh appropriate management options and would respond from a suite of potential actions that include: focused enforcement of regulations, education (e.g., additional information and regulatory signs and exhibits, brochures and fliers, public meetings, meetings with user groups, etc.), establishment of buffer zones to protect sensitive habitat and species, time/use restrictions, and special use permit (SUP) restrictions.

The principal purpose of the primary management response is to improve and achieve compliance by outreach and educating dog owners about the rules. A program will be developed in partnership with local organizations, which could include counties and nonprofit foundations or organizations, to provide education and training for dog owners and their dogs. [Note: this component should be more fully developed in consultation with local groups in the development of the proposed final plan and EIS.] GGNRA staff would not be involved in training programs but could help direct visitors to these resources.

Primary management actions fall into the following categories. A primary management response may include actions from more than one category, as appropriate to area or zone and the nature of the observed noncompliance.

A. Rule and enforcement interpretations or clarifications

As a general guideline, this type of response is designed to address documented confusion by visitors over the meaning or intent of the rules. A corollary role is to clarify enforcement policies or practices if needed.

A primary purpose of the dog management plan is to adopt clearer rules, and a basic purpose of the start-up phase is outreach and education on these rules. In part because the rules are new to visitors, noncompliance and enforcement policy or practices may be related to questions or confusion about the rules. This management response is designed to meet the objectives stated above by providing interpretations or clarifications if needed. This management response does not substitute for the public rulemaking process for amending the rules if needed.

B. Education and training

As a general guideline, this type of management response is designed to address documented lack of knowledge by visitors about the rules or areas where dog walking is allowed.

For example, there are key components of regulated off leash areas (ROLAs), which may be unfamiliar to visitors. Some visitors may not be familiar with or have adequate skills to maintain voice control standards. These types of management response ranges from broad outreach and education to assisting individual dog owners obtain needed training. Appendix A provides an example of training and educational opportunities from a community partner, the San Francisco SPCA.

C. Signage and physical improvements

As a general guideline, this type of management response is designed to address documented problems or suggested improvements in signage or other actions that involve physical improvements to improve compliance and protect resources.

Better signage or other visual and physical cues are a key element of providing clearer rules to visitors. In addition, the dog management plan includes changes in dog walking access in certain areas or zones of GGNRA. Compliance problems may be related to the clarity of the way the rules are presented in signs or on the physical landscape (such as location of signs, location or type of fencing, berms or other barriers on the trails). The monitoring program will help to identify areas where improvements would be an effective primary management response.

D. Use restrictions

As a general guideline, this type of management response is designed to address documented conflicts where better understanding of the rules or better on-site conditions are not likely to improve compliance.

For example, monitoring may identify places where recurring problems could readily be addressed by some additional separation among types of uses and

time/use restrictions or a buffer area would be appropriate. This management response does not substitute for the public planning process of amending the dog management plan or rules if the use restrictions would effectively reduce the dog walking access allowed under the plan or rules.

Areas with the highest rates of noncompliance, and/or sensitive resources, will receive first priority for primary management responses.¹ Noncompliance based on insufficient voice control would be addressed by primary management response categories A-C (unless the 75% trigger discussed in the next section has occurred).

Aggressive dogs or unsafe behavior (e.g., resulting in cliff rescues) are treated on an individual, case-by-case basis, and may result in banning a particular dog from the park, or if applicable, a SUP restriction. Violations recorded by the monitoring team will count towards the rate of noncompliance.

In reviewing the monitoring results and primary management responses, the adaptive management oversight team may recommend improvements in the education and outreach program, identify areas or zones where signage or physical barriers appear to be insufficient and may recommend improvements to GGNRA, or otherwise refining management measures to address the types of problems observed and improve the level of compliance.

Secondary management response (Tier2)

When compliance falls below 75% over a yearly rolling average (measured as the percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations), in a management zone (on-leash, voice control, or no dogs) in any of the specific areas addressed by the plan, the zone's management *may* change to the next more restrictive level of dog management, for example: ROLA to on-leash, or on-leash to a recommendation to close the area to dogs.

The initial 12-month rolling average is based on data collected during months 6-18 after initiation of the dog management plan, and secondary management responses would not be implemented until after the first 18 months, during which the monitoring plan will be tested and baseline data collection begun. Primary management responses would be implemented during this time if needed. [Note: there are numerous comments and questions about how the compliance level will be calculated; this section may need revision or further explanation.]

¹ ⁴ If Section 7 consultations pursuant to the *Endangered Species Act* requires preparation of a Biological Opinion, management responses related to threatened and endangered species will be governed by the Terms and Conditions described in the Biological Opinion, and could be separate from or coordinated with the compliance-based adaptive management strategy program. Emergency closures for listed species protection may also occur outside of this program.

The rationale for an 18 month period before a secondary management response could initially be applied is as follows:

- a. Months 0-6: provides for a 3-month public education period after plan implementation, and an additional 3 months to test, possibly modify, and implement the monitoring plan.
- b. Months 7-18: provides one year to implement the full range of possible management actions addressing noncompliance as outlined in the primary management response, and provides 12 months of monitoring data.
- c. One year rolling average is measured at the end of each month; after the initial 18 months action could be taken after any month as long as there are 11 consecutive preceding months of data.

Regular monitoring of an area over a 12-month period is required before secondary management responses can be implemented. NPS will prepare annual reports documenting monitoring data collected and any consequent management actions, which will be made available to the public. NPS will also release a preliminary report providing baseline data after the first 6 months of monitoring (month 12 after plan initiation).

If the rate of compliance in the area that has been subjected to more restrictive management (e.g., voice control to on leash) is better than 75% for three consecutive years, the area will revert to the prior management (e.g., on leash to voice control).

As previously noted, noncompliance is being used as a surrogate or indicator of resource conservation but does not necessarily equate to impact on recreation area resources. Therefore, the adaptive management program has two additional triggers during the secondary response that may provide for an objective review to relate compliance to the program objectives stated earlier, prior to moving to a more restrictive management level.

- a. More restrictive category (voice control to on leash) –The adaptive management oversight team will be notified in advance of any planned secondary management response. If all or nearly all of the team agree, the team may request a review of whether the secondary management response is warranted based on whether dog use caused unacceptable impacts or impairment of resources (Tier3 response).
- b. Closure (no dog) recommendation – If the monitoring results in a recommendation to close an area to dog walking (no dogs), the third tier access assessment and response will be triggered.

These reviews are part of the implementation of the dog management plan and its adaptive management program and do not involve preparation of a NEPA environmental assessment or EIS document.

Access assessment and response (Tier3)

This third level of management response is a decision to close or open access for dog walking, or may be triggered as described in the Secondary Management response before applying further restrictions.

A decision to open or close access presents a decision that potentially affects many visitors and, under an adaptive management program related to articulated objective or success criteria, should be taken based on sound scientific or technical information, rather than on a formula based on a surrogate indicator that may not accurately reflect actual conservation of resources.

Prior to closure of an area, an access assessment report shall be prepared and discussed with adaptive management oversight team. The report will review the effect the noncompliance has had on visitor experience and/or the integrity of the conservation of the natural resources, as appropriate to the monitoring data. [See prior note regarding the need to have some appropriate baseline data.] The report will review the relationship between the type of noncompliance observed and the objectives described earlier in this program.

The adaptive management oversight team may make a recommendation to GGNRA staff regarding the appropriate management action. Based on the report and any recommendation, primary or secondary management response may be taken, including, for example, improved signage or barriers, other restrictions, partial closure, or closure.

Likewise, if an area is proximate or similar to an area or zone where dog walking is allowed and has had three consecutive years of more than 75% compliance, an access assessment report shall be prepared and discussed with the adaptive management oversight team regarding the expected effect of opening or increasing the area or zone to dog walking.

The adaptive management oversight team may make a recommendation to GGNRA staff regarding the opening or increasing an area. Based on the report and any recommendation, the area for dog walking may be increased or opened under conditions specified.

Appendix A – Community Education and Information/ San Francisco SPCA Behavior & Training

Below please find descriptions for an information session and two classes to support responsible dog guardianship in our parks. The SF/SPCA will add classes as needed to provide the public with the education and training as needed for responsible recreational access for people and their dogs.

Public Education and Information Session

1. Free Information Session / Off Leash Manners for Responsible Canines

DO YOU WANT TO LEARN HOW TO BE A RESPONSIBLE DOG GUARDIAN in a voice control area? COME TO OUR **FREE** Off Leash Manners Information Session!
SOME OF THE TOPICS COVERED WILL INCLUDE:

- What types of dogs are candidates for voice control areas
- How to get your dog prepared for off leash freedom
- How to distinguish play from fight
- When to interrupt play
- What to do in case of a dog fight
- Obedience Training
- Dog size differences
- Why should you spay or neuter?
- Sharing the space; voice control, socialization and respecting the environment

2. Dog Training Class / ROCKET RECALLS! J Short Session Class

A 3 week class to improve your dog's off leash recall skills. Problem solve with a trainer for a 45-minute session.

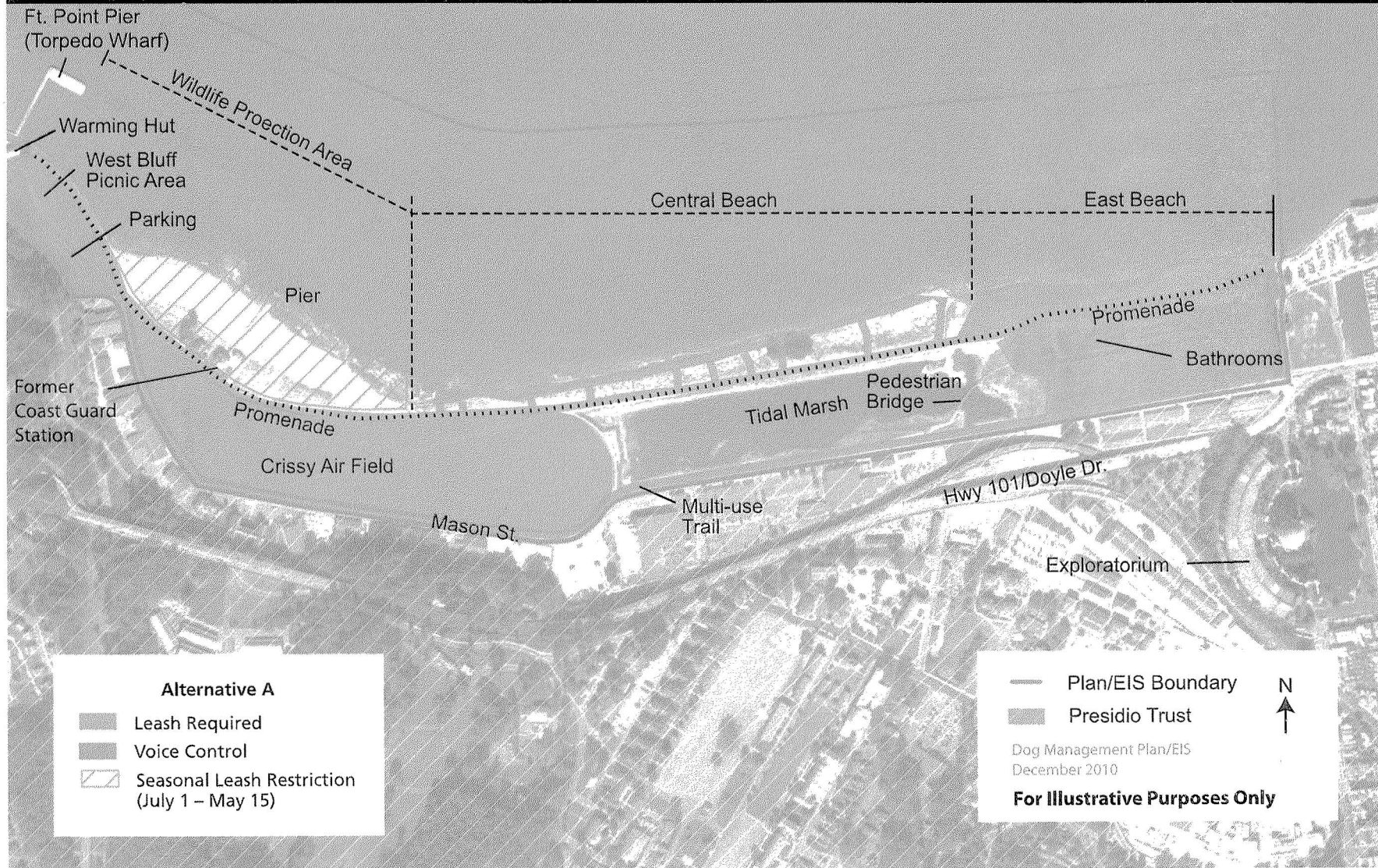
- Understand the rules of recall
- Recall dogs from 30-60 feet with some distractions
- Recall dogs from 15 to 30 feet with some distractions
- Learn how to keep dogs safe & implement rules in real-life situations

Frequency & Duration: 45 minutes per week for 3 weeks

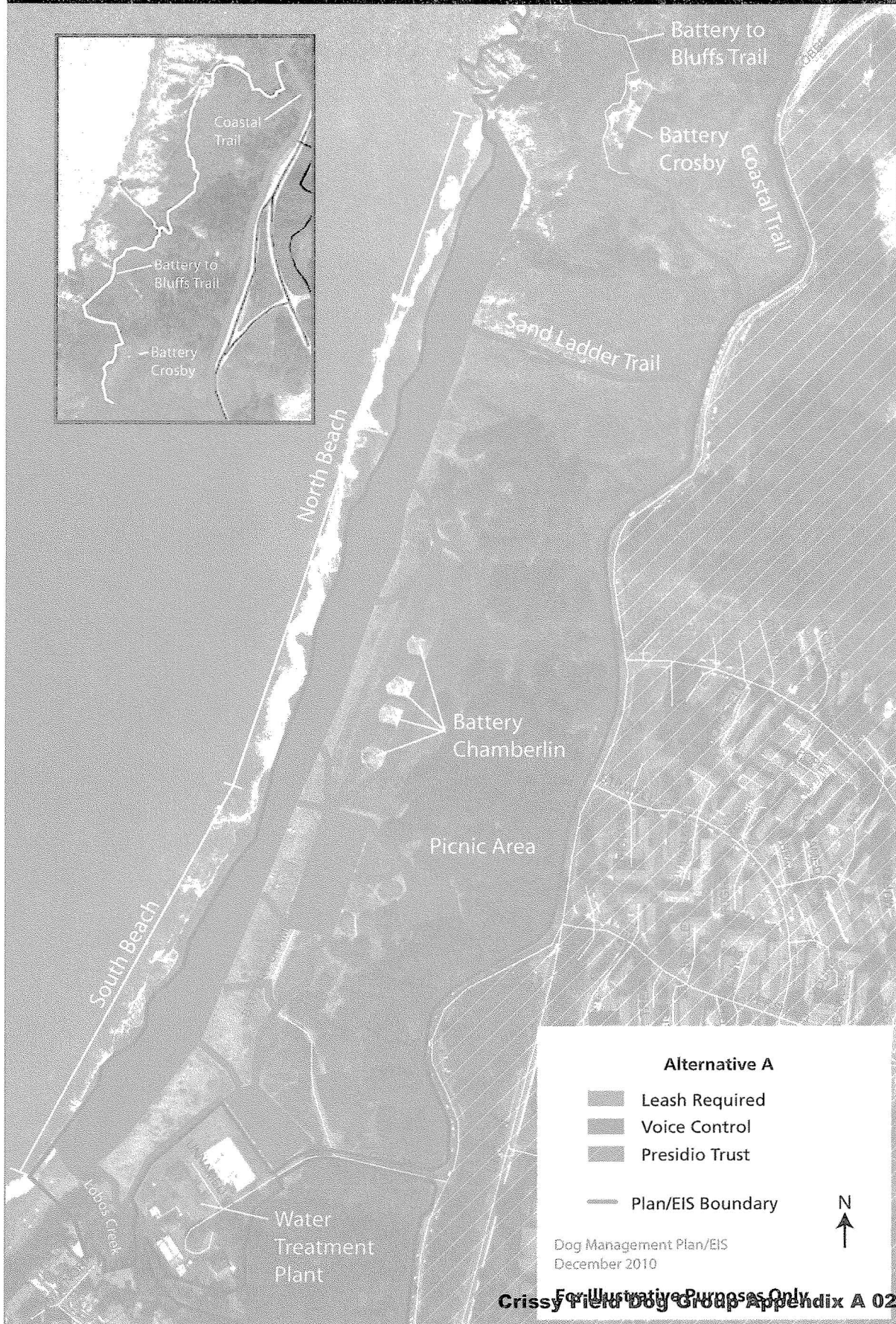
3. Trail Manners Class / One time class at various locations

In collaboration with local dog groups or responsible agencies, provide an instructor for a 1 hour, outdoor, off-leash trail manners class.

Map 10-A: Crissy Field



Map 12-A: Baker Beach



Map 13-A: Lands End / Fort Miley



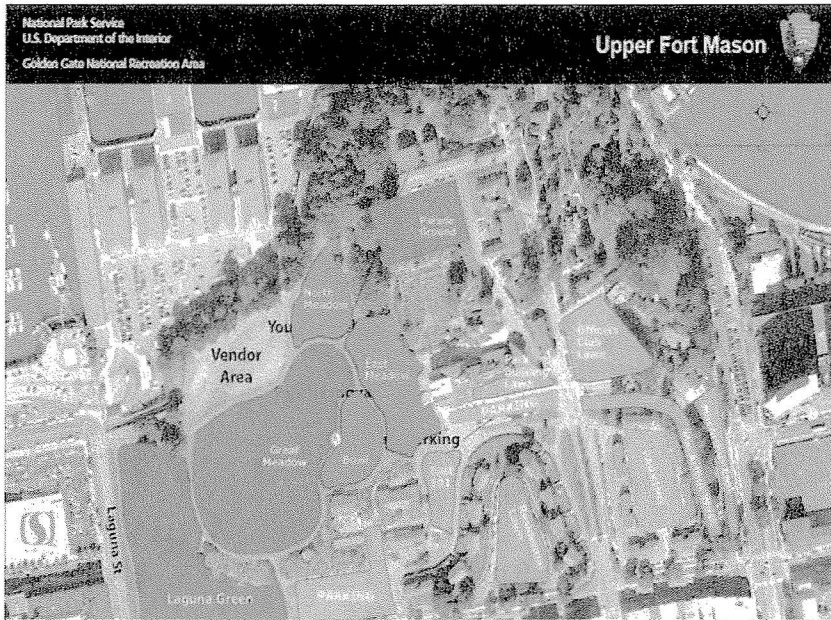
Upper Fort Mason (UFM) Option 1

Character of the Park

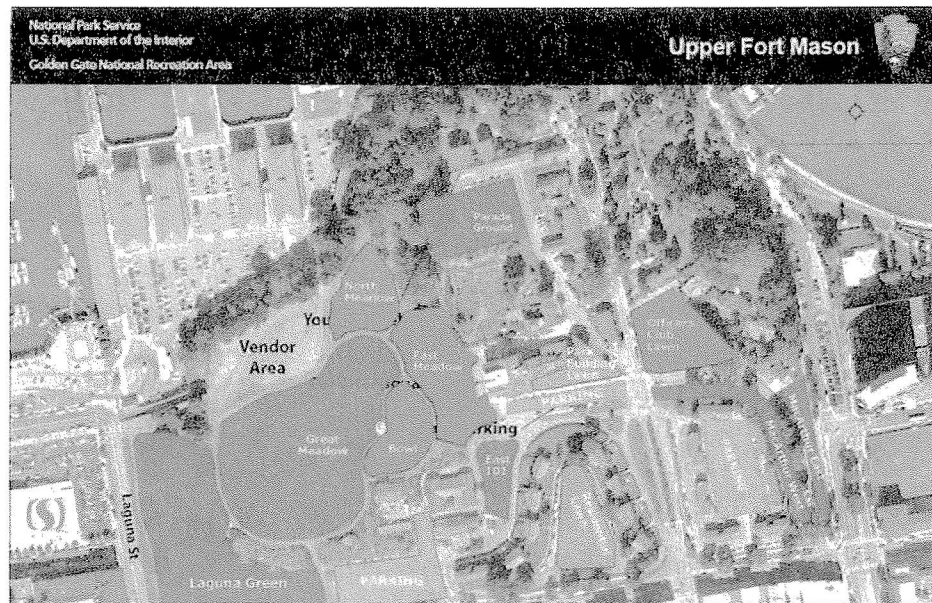
- Historical usage for voice and sight control recreation
- Urban neighborhood park
- Most park visitors reside in adjacent neighborhoods
- No incident area, as characterized by GGNRA staff

Discussion Draft

Because of the requirements of the Park Service's parameters, the areas to be considered for off leash have been limited to Laguna Green, the Great Meadow and the Parade Ground.



Option I



Option I Summary

A. Voice and Sight Control Areas (Blue Areas as depicted on Map)

1. The Parade Ground
2. Great Meadow
3. The Laguna Green
4. MacArthur East
5. MacArthur West
6. East 101

Summary of Rationale for Option I

- Propose landscape barriers for Laguna Green; without barriers, it would be difficult for Laguna Green to be a voice and sight control area due to 4 lane, high speed traffic of Bay and Laguna Streets;
- East 101 provides an area for dogs coming from cars that need to immediately relieve themselves. All surrounding areas are no dog areas. There is indirect light for the evenings;
- The only water fountain with dog bowl is in Great Meadow;
- Great Meadow has the only paved walkway for use by seniors and disabled;
- Areas provide indirect lighting from street lamps in the evenings;
- Combined area allows for appropriate dispersion of dogs;
- Areas provide some shelter from the wind;

While the park visitors utilizing the Great Meadow are predominantly dog owners, there are other park visitors during the day.

Voice and Sight Control Areas

Park visitors without dogs rarely utilize the above identified voice and sight control areas. Many people actually considered the Laguna Green to be somewhat outside the Park because of the current landscaping between the Great Meadow and Laguna Green. As such, allowing off leash recreation would not appear to interfere with other park activities. There is little commercial dog walking here.

Landscape Barriers are proposed for Laguna Green along the perimeter for safety from the adjacent traffic. One possibility would be a mid-height hedge with an impermeable interior barrier high enough to protect against the traffic, but not so high as to encourage vagrancy or other safety issues. The hedge should be sufficiently wide and should contain some sort of fencing that can be hidden within the hedge.

This option proposes the barriers to be just inside of the paved walkways that parallel the city sidewalks along Bay Street and along Laguna Street. This way, all visitors can utilize the walkway or the sidewalk that is directly alongside the traffic. Additionally, the landscape barrier would not interfere with the sight of drivers as they approach the turn from Bay onto Laguna.

These voice and sight control areas have the benefit of providing indirect light from street lamps during the winter months when evening falls so early. They also allow for some shelter from the wind.

The water fountain adjacent to the Great Meadow is the only fountain with a ground level faucet and drinking bowl for dogs.

The Great Meadow provides critical voice and sight control recreation. It is the only area large enough to allow for reasonable dispersion of the high number of dogs that visit the Park. This area is the only area with a paved sidewalk providing seniors and disabled park visitors the ability to exercise their dog in an environment safe for them to do so.

Many retired and elderly dog-owners walk their dog during the day.

On Leash Areas

In acknowledgement of the GGNRA Headquarters and parking lot, Option I proposes the lawn in front and around the building as on leash only.

The residential lawn is in close proximity to the front lawns of the homes in the area. Option I proposes it be on leash, rather than no dog, because there are dog owners and dogs that reside in this area.

No Dog Areas

Option I proposes these no dog areas so other park visitors may enjoy this area without dogs. Weather permitting, you will see occasional sunbathers and picnickers along the slopes leading down the West Meadow and in the relatively flat area making up the North Meadow. These areas are adjacent to the GGNRA Headquarters parking lot. They provide access between Upper Ft. Mason and Aquatic Park, the Youth Hostel and Lower Ft. Mason (via the stairs to piers).

The North and West Meadows are easily identifiable areas that are easily amenable to landscape barriers. Such barriers would help to ensure that there is a separation between voice and sight control and no dog areas.

These no dog areas provide a substantial barrier between the voice and sight control areas and the Park Service buildings and parking lots.

In light of the special events that take place at the Officer's Club, the Option I proposal includes the Officer's Club Lawn as a no dog area.

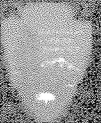
Management Measures for Upper Ft. Mason

Commercial Dog Walkers: CDWs must apply and receive a commercial permit to walk dogs from the GGNRA. Limit number of dogs walked at one time.

OTS/TAG Program: Each dog owner must apply, review the video and receive a TAG to walk their dog in the GGNRA. This GGNRA sponsored program will allow the park the ability to educate and enforce dog etiquette and leash law requirements.

Public outreach: Create brochures, clear signage about off leash, on leash and no dog areas. Make sure that these areas are posted at trailheads (and fire roads), and on bulletin boards, and web site postings at the park. Designate a point person for the dog walking community to contact. Conduct waste clean up events. Make doggie bags and trash cans available.

Map 16-A: Fort Funston



Voluntary Seasonal Closure
(April 1 – August 15) 50ft
from cliff during Bank
Swallow nesting season.

Pacific
Ocean

Habitat Protection Area

Great Highway

Wastewater
Treatment
Plant

Lake Merced
North Lake

Harding Road

Trail section closed
due to erosion.

Harding Park
Municipal Golf Course

Lake Merced
South Lake

Coastal Trail

Beach
Access
Trail

Skyline Blvd
(Hwy 35)

Bay Area Ridge Trail

SF Police
Firing Range

Drinking
Fountain
Stairs

Parking

Battery Davis
BATTERY DAVIS TRAIL

Sunrise Trail

Chip Trail

Horse Trail

John Muir Dr.

Skyline Blvd

Alternative A

- Voice Control
- Voluntary Seasonal Closure

Dogs prohibited in unshaded areas
within Plan/EIS Boundary.

Plan/EIS Boundary

Dog Management Plan/EIS
December 2010

For Illustrative Purposes Only



Outflow
Pipe

Observation Deck
Hang-Glider
Launch Area

Parking Lot

Picnic Area
Restroom

Hang-Glider
Landing Area

Environmental
Science Center
S.F.U.S.D. Area

Sand Ladder

Coastal Trail

Accessible
Trail

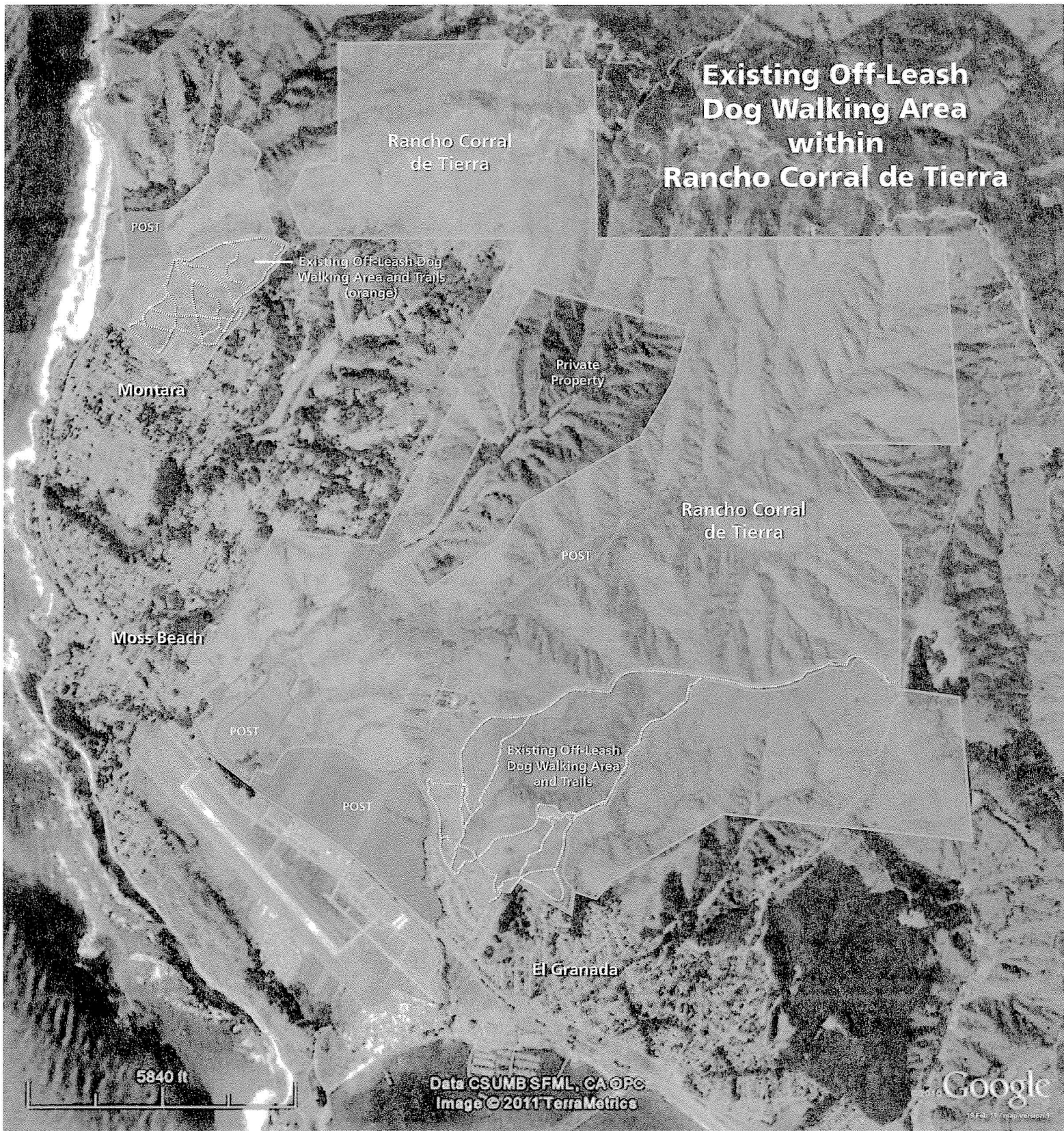
Park Operations

Main Entrance

No dogs in buildings

Olympic Club
Golf Course





Existing Off-Leash Dog Walking Area within Rancho Corral de Tierra (El Granada)

Rancho Corral de Tierra
(green boundaries)

Existing Off-Leash
Dog Walking Area
and Trails
(orange boundaries)

El Granada

POST

Google™

2011 Google
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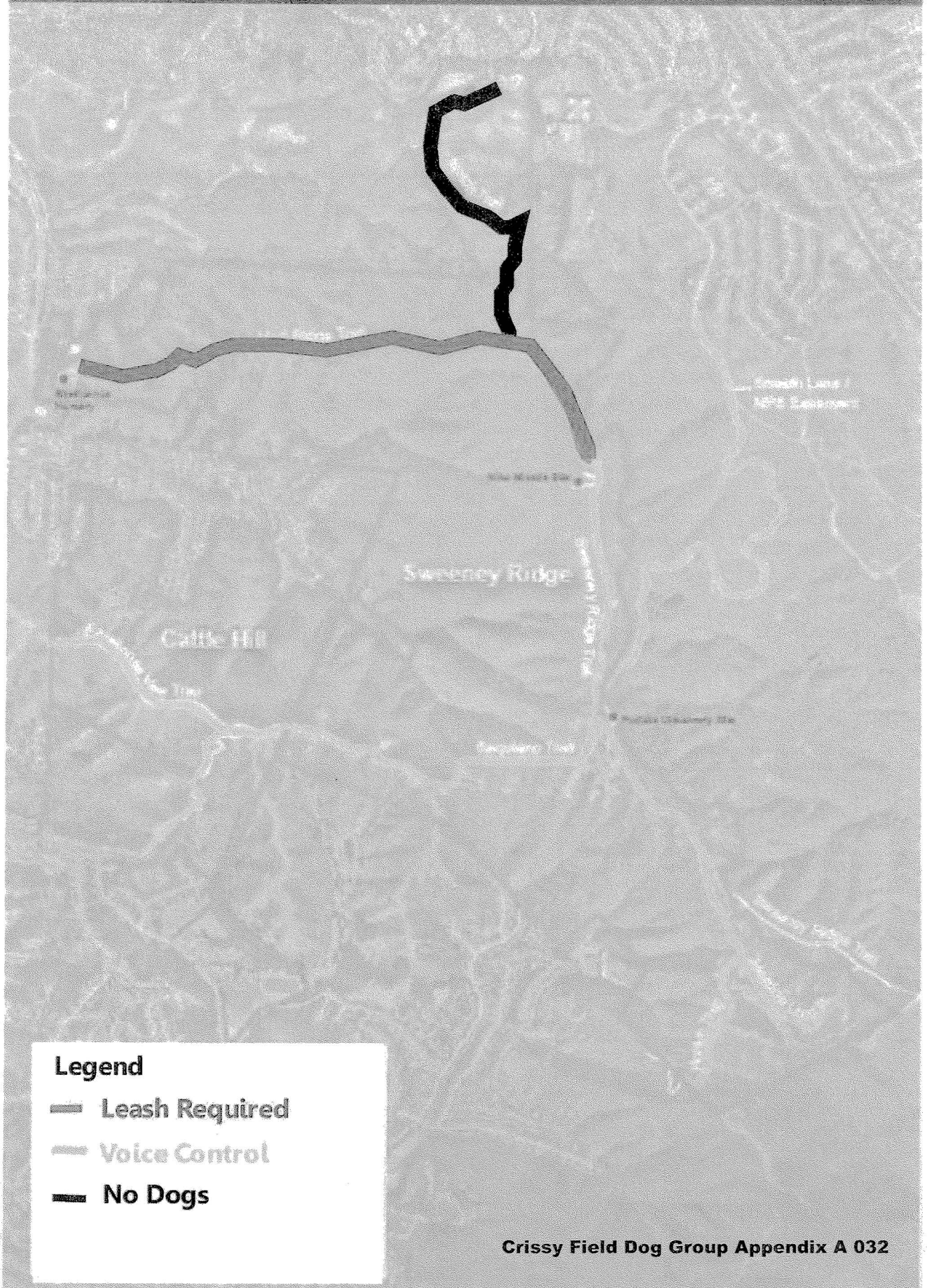
Data SIO NOAA U.S. Navy ICAO GEBCO
Streaming

Point: 37° 50' 58.59" N 122° 35' 56.88" W Elev: 245 ft

Chissy Field Dog Group Appendix A 050-46-014



Sweeney Ridge/Cattle Hill Suggested Alternative



Legend

- Leash Required
- Voice Control
- No Dogs

National Park Service
U.S. Department of the Interior
Golden Gate National Recreation Area

Milagra Ridge Suggested Alternative



Appendix A

Hybrid Alternative

1) We request the NPS consider an Alternative that would allow dogs on-leash on the fire roads that run out of the GGNRA and/or border the boundaries between the GGNRA and the communities that are adjacent to the GGNRA. The fire roads and the two trails listed below would allow a person with a dog on-leash to walk in the GGNRA in Marin from the southern end of Sausalito on the fire roads that are near the eastern boundary of the GGNRA north to Marin City and Tam Valley, and then to walk west along the fire roads near the northern boundary of the GGNRA to Muir Beach.

- The GGNRA shares a border with Sausalito, Mill Valley, Muir Beach and unincorporated Marin County land including Marin City and Tam Valley. The fire roads that connect the GGNRA to these communities and the fire roads that run near the boundaries of the GGNRA with these communities should be accessible to the public walking with their dogs on-leash.
- The fire roads that lead from the neighboring communities into the GGNRA and run adjacent to them are, from Muir Beach in the north to Sausalito in the south:
 - Coastal Trail from Muir Beach to Coastal Fire Road to Coyote Ridge Trail (a fire road) to Miwok Trail (a fire road).
 - Miwok Trail from Highway 1 to Coyote Ridge Trail.
 - Miwok Trail from Tennessee Valley Road to Coyote Ridge Trail.
 - Marin Drive from Tam Valley to the Miwok Trail.
 - County View Road from Tam Valley to the Miwok Trail.

- Tennessee Valley Road (or the adjacent Rhubarb Trail (Marin County trail)) to Oakwood Valley Fire Road.
- Oakwood Valley Fire Road from Tennessee Valley Road to Alta Trail (a fire road).
- Alta Trail from Donahue Avenue in Marin City to Rodeo Valley Trail.
- Pacheco Fire Road from Marin City to Alta Trail.
- Orchard Fire Road from Marin City to Alta Trail.
- Rodeo Avenue from Highway 101 to Alta Trail.
- We are requesting on-leash access to two trails because they provide access to 2 of the fire roads listed above:
 - The Morning Sun Trail that was built to provide access from Sausalito to the GGNRA Headlands; it goes from the Spencer Ave bus-pad on the west side of 101 up to Alta Trail.
 - The SCA trail that runs parallel to Wolfback Ridge Road and about 20 feet below it. This trail connects Alta Trail with the fire road (this one is un-named) that goes over the 101 tunnel and then back into Sausalito (it comes out on Hecht Avenue).

The fire roads listed above are 12 feet wide on average, providing plenty of room for multiple use. Dogs on a 6 foot leash will not be causing damage to wildlife or native habitat, or disturbing other users. These fire roads are all adjacent to the freeway and/or the communities of Southern Marin. They are not in the heart of the Headlands. They can all be accessed from outside the GGNRA reducing auto traffic into the GGNRA.

There has been little or no discussion of on-leash access for dogs in the GGNRA, the focus of concern has been off-leash / voice control use. For those of us who hike long distances with our dogs, on-leash access is important. As the Baby Boomers age, having a dog along on-leash on a long hike is an issue of safety and ensures that we will continue to exercise.

2) Retain the 1979 Pet Policy (Alternative A) for all of Rodeo Beach, keeping both the north and south ends, for off-leash use.

- To address concerns regarding dogs interfering with other beach users, we think 'timed' use makes sense, i.e. during days and/or hours that there are many visitors to the beach, dogs should not be allowed. The NPS argues that this is too difficult to enforce. We do not understand this logic. Timed-use is in practice many places; common sense tells us it requires less, rather than more enforcement.
- Most of the year the weather at Rodeo Beach is cold and windy, and often foggy. As a result there are few visitors to Rodeo Beach other than surfers, people with their dogs, and staff and children from the Headlands Institute. May through October (when there are warm days), there are more visitors, but even then before 10 am and after 3 pm there are few visitors other than surfers and people with their dogs.
- For humans that want a no-dog experience at the beach there are many other beaches from which to choose. Between the Golden Gate Bridge and the Sonoma County line the only public beaches that currently allow off-leash dogs are Rodeo Beach and Muir Beach. Upton Beach is part of Marin County Parks and Open Space and allows dogs on-leash. There are 3 short stretches of beach at the Pt Reyes National Seashore that allow dogs on-leash. Dillon's Beach at the very northern end of the County is a private beach that allows dogs on-leash. That's it for the dogs on ocean beaches in Marin.
- Rodeo Beach (not Rodeo Lagoon) has little to no bird activity (confirmed in the Draft Plan/DEIS) as it is very steep and provides no nutrients for birds. The Marine Mammal Center (TMMC) has stated that dogs are not a threat to stranded marine mammals: *“seals and sea lions have the potential to strand anywhere in California, but*

this does not mean that sites cannot be set aside for dogs off-leash. Furthermore, public walking their dogs can be an important arm of the stranding response-they can notify TMMC, and help with setting up a barrier around the stranded animal, as they are likely to be among the first people to spot a stranded animal.”
(Frances Gulland, Director of Veterinary Science, The Marine Mammal Center.

3) Retain the 1979 Pet Policy (Alternative A) for Muir Beach, keeping off-leash/voice control access. We leave it to the Muir Beach Community to address the specific concerns and mitigations for dogs on Muir Beach.

4) Retain the 1979 Pet Policy (Alternative A) on Alta Trail from Donahue Avenue in Marin City to Orchard Fire Road, and on Pacheco Fire Road from Marin City to Alta, and on Orchard Fire Road from Marin City to Alta, allowing dogs off-leash/under voice control.

- This stretch of Alta Trail (a fire road) is on top of the ridge and is approximately 1 mile long. On the east side of the fire road you look down onto Marin City and Highway 101. On the west side of the fire road you look down onto Tennessee Valley.
- This is the most used stretch of fire road in the GGNRA in Marin. There are dozens of humans with their dogs every day at this location. There are also hikers and bike riders, and an occasional horseback rider. The first quarter of a mile runs through private property that provides county easement into the GGNRA.
- This fire road is in use by vehicles from PG&E, MMWD, Park Conservancy volunteers, and GGNRA staff. This is not pristine wilderness, but it is much loved and used by many Marin residents.
- Our understanding is that the Mission Blue Butterfly habitat that is being planted along Alta is the main argument against dogs off-leash on Alta

Trail. We have never seen a Mission Blue Butterfly along Alta Trail, but we suppose if enough Lupine is planted they may come. There are many other areas in the thousands of Headland acres that Lupine could be planted to create Mission Blue Butterfly habitat where the Mission Blues might also come. There is no evidence that the presence of dogs displaces Mission Blue Butterflies.5) Retain the 1979 Pet Policy (Alternative A) for the section of Julian Fire Road between McCullough Road and the Historic Firing Range. This is a one mile section of fire road that runs above Fort Barry housing. This section of the road is built into the side of a steep hill with heavy scrub on either side, restricting humans and dogs to the fire road. The road is frequently used by both hikers with dogs and bike riders; there is room to accommodate both.

6) Retain the 1979 Pet Policy (Alternative A) for Old Bunker Road loop. This is a wide paved fire road frequently used by hikers with and without dogs. There are a few bike riders, but not many and there is plenty of room on this road for everyone. The road circles up from the entrance to the Marine Mammal Center, runs above Fort Cronkite, around the water tank, and Battery Townsley and then back down to Rodeo Beach.

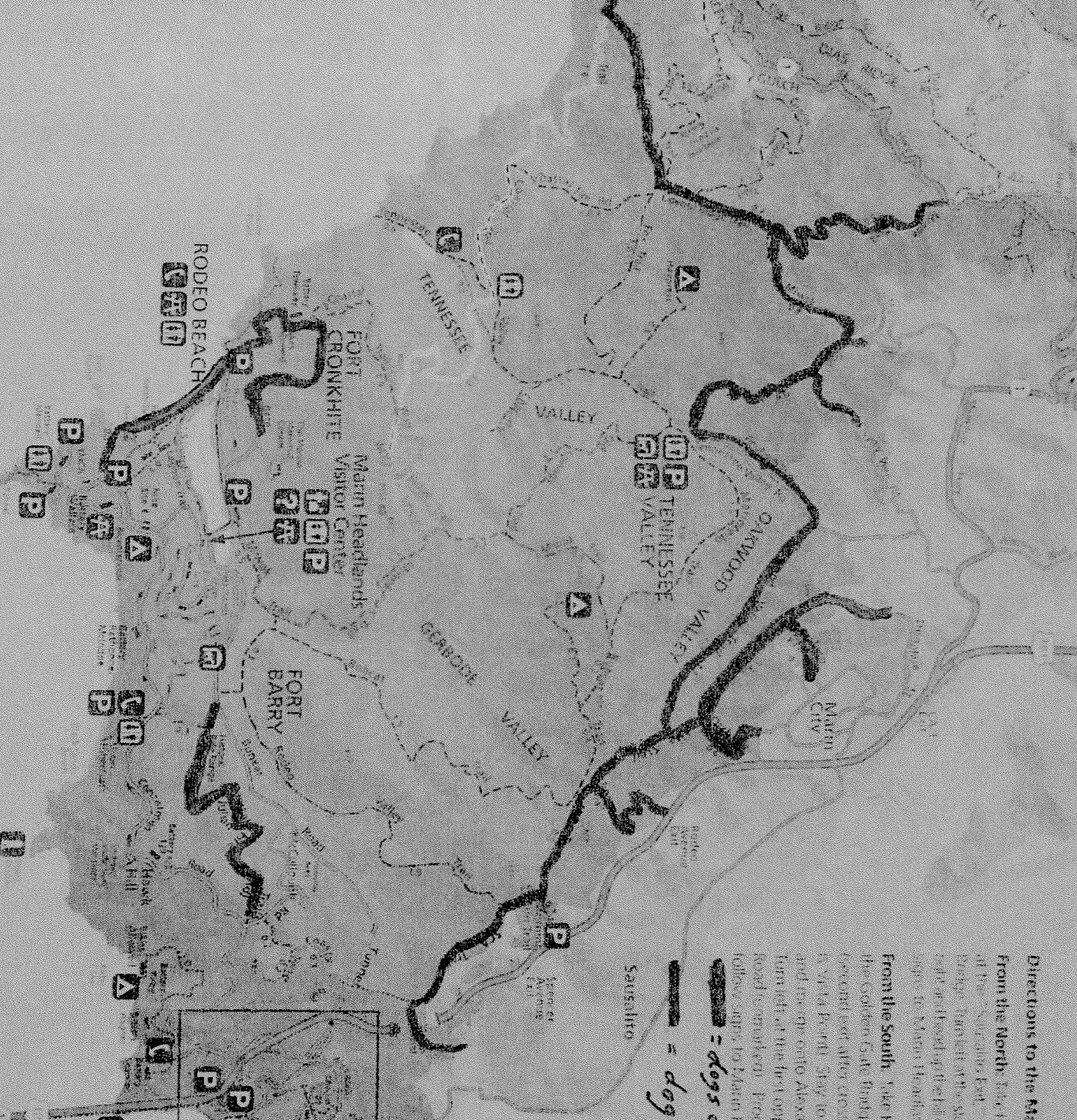
- The Old Bunker Road loop road is an alternative to Rodeo Beach for hikers with dogs on warm sunny days.

7) Retain the 1979 Pet Policy (Alternative A) in Homestead Valley, allowing dogs off-leash/under voice control. This portion of the GGNRA is in the middle of the Homestead Valley neighborhood of Mill Valley. The community has been walking with their dogs in this area for years, and there is no evidence that the presence of off-leash dogs in this area has damaged habitat or native species. Enforcement in this area would be, to put it succinctly, a nightmare.

1-5656 or 911
331-1540

Call the Marin Headlands
at 331-1540. A map of
the area is also available
for a fee. The center
is open 7 days a week
from 10:00 am to 5:00 pm.
The center is open 7 days
a week from 10:00 am to
5:00 pm. The center is
open 7 days a week from
10:00 am to 5:00 pm.

Call the Marin Headlands
at 331-1540. A map of
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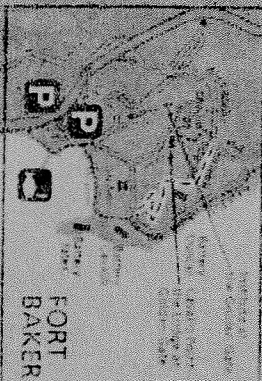
Directions to the Marin Headlands

From the North: Take Hwy 101 southbound and exit at the "Sausalito Exit" just before the Golden Gate Bridge. Turn left at the stop sign then bear right onto the 101 and follow it to the Marin Headlands.

From the South: Take Hwy 101 northbound and exit at the "Sausalito Exit" just before the Golden Gate Bridge. Turn left at the stop sign then bear right onto the 101 and follow it to the Marin Headlands.

— = dogs on-leash

Sausalito



Inset map on back

5/26/11

Marin Unleashed DE IS Comment

MARIN COUNTY
KEEP MUIR BEACH DOG FRIENDLY CITIZENS COMMITTEE
RESOLUTION OPPOSING PREFERRED DOG MANAGEMENT
ALTERNATIVES FROM NATIONAL PARK SERVICE/GOLDEN GATE
NATIONAL RECREATION AREA

WHEREAS:

1. The National Park Service (NPS) and Golden Gate National Recreation Area (GGNRA) recommend banning dogs from Muir Beach in Preferred Alternative D of the Dog Management Plan.
2. Preferred Alternative D would also eliminate dog access to the Coastal Fire Road and Trail adjacent to Muir Beach.
3. The community of Muir Beach was established as a residential community before stewardship of the NPS and has historically and safely allowed responsible off-leash dog use of its beach and surrounding trails.
4. The GGNRA was mandated by Congress in 1972 to: *“provide for the maintenance of needed recreational open space necessary for urban environment and planning”, “to assure the preservation of open spaces” and “to provide public access along the waterfront and to expand the maximum extent possible the outdoor recreation opportunities available to the region.”*
5. Preferred alternative D states that *“off-leash dog walking can occur at a small beach area on county property adjacent to the NPS beach”* (commonly known as “Little Beach”). Little Beach is not accessible without crossing the main beach or driving along neighborhood private roads. There is no public parking on Sunset Way or Pacific Way. These single lane local roads are fire lanes. Extra and illegally parked cars would create a hazard by blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no amenities or services for Little Beach. No trash cans. No toilets. Most significantly allowing access only to Little Beach would endanger the health and safety of both humans and animals. Formally stating and implementing such a plan would require appropriate impact studies and input from the surrounding community, the Muir Beach Community Services District, and Muir Beach Volunteer Fire Department.
6. No evidence has been presented which indicates that use by dogs is more harmful to environmentally sensitive areas than use by people, it is unreasonable and invalid to restrict usage of Muir Beach and Coastal Trail to dog owners.
7. There is currently no continuous trail from Muir Beach to Mill Valley that allows access with a dog.

8. NPS proposes spending 900,000 dollars to enforce these preferred unprecedented dog management rules

NOW, THEREFORE, BE IT RESOLVED

1. Muir Beach and the Coastal Trails must remain open (as outlined in Alternative A) for multi-use recreational activities for all residents of Marin and surrounding Bay Area counties.

2. In order to protect the newly restored Redwood Creek and lagoon areas with its sensitive habitat and wildlife, signage and boundary markings must be made clear, understandable and visible. Specifically, a large sign at the footbridge entry to the beach must be added which clearly defines beach rules for all visitors. Additionally, signs and boundary markings must be placed at the lagoon and creek areas which forbid swimming, trampling on vegetation or disturbing wildlife in these areas. NPS must properly enforce rules for all visitors and impose appropriate fines.

3. As is the case in most dog-friendly parks, a dog litter bag dispenser and waste receptacle, along with a signage stating distinctly dog management rules must be placed in prominent locations to encourage responsible dog control and management.

4. Dog-access from Coyote Ridge Trail to Miwok Fire Road must be granted to allow hikers with dogs to cross from Muir Beach into Mill Valley.

ATTEST:

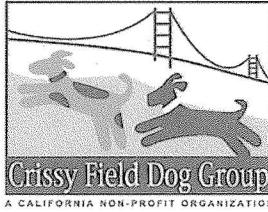
Joan Burton Wynn
Committee Chair

Professional Dog Walkers Guidelines for GGNRA Lands

1. Professional Dog walkers must carry a leash for each dog in their care.
2. Professional Dog walkers must pickup dog waste for all dogs in their care.
3. Professional Dog walkers will be limited to the number of dogs allowed by the county that the GGNRA land abuts, i.e. Marin county 6 dogs; San Francisco county 6-8 dogs; etc. If the county does not have a limit, the default limit will be 6 dogs.
4. Professional Dog walkers will carry a liability insurance policy for \$1 million. Proof of policy must be shown to acquire permit.
5. Professional Dog walkers will be able to use the GGNRA lands from 8 am to 5 pm Monday through Friday. Saturday and Sunday Professional Dog walkers will be not allowed in the GGNRA lands from 11 am to 3 pm.
6. Professional Dog walkers will pay a permit fee to use the GGNRA lands, (recommend \$100 per dog walker, as they also must pay county permit fees).
7. Professional Dog walkers will transport dogs in a safe well ventilated vehicle.
8. Professional Dog walkers must have their dogs under voice control.
9. Professional Dog walkers must abide by all rules regarding off leash dogs, on GGNRA lands
10. Having more than the allowed number of dogs will result in a fine for every dog over the limit. Second offense will result in a doubling of the fine, per dog. Third offense will result in suspension of dog walkers' permit for up to three months.

Proposed Education and Outreach

- Video describing expectations about dog etiquette, leash requirements and the importance of compliance.
- Brochure depicting (with a map) areas for off leash, on leash and no dogs.
- Having a map of San Mateo and Marin county sites plus maps for individual sites for San Francisco.
- At least one large map posted in each area clearly identifying recreational dog parameters, i.e., off leash, on leash, no dogs:
 1. Proper dog etiquette (voice and sight control/leash/collar/tag, etc.)
 2. Natural resource protection/awareness
 3. Seniors/disabled awareness
 4. Safety: Children/School groups
 5. Marine mammals
 6. Horses
 7. Other park users
 8. Clear signage/Enforcement
 9. Public outreach: SF SPCA/Marin Humane Society/Vet clinics/Pet shops in the 3 counties (need a 4-6 months' PR Program)
 10. Public/private partnership



P.O. Box 475372 San Francisco, CA 94147-5372 Please Visit Our Website: www.crissyfielddog.org

May 23, 2011

VIA FEDERAL EXPRESS

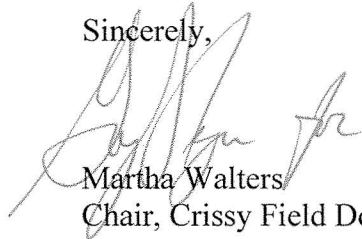
Mr. Frank Dean, GGNRA Superintendent
Building 201, Fort Mason
San Francisco, CA 94123-0022

Dear Mr. Dean,

Please find Crissy Field Dog Group's master Appendices B through K (Pages 1 to 53) to the CFDG comments on GGNRA's Draft Environmental Impact Statement and Dog Management Plan.

We will be submitting our overall comments and Appendix A under separate cover.

Sincerely,



Martha Walters
Chair, Crissy Field Dog Group

RECEIVED
MAY 24 2011
SUPERINTENDENT'S OFFICE

Index to Crissy Field Dog Group Appendices B to K

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Appendix B

Recreation Resources – Suggested Annotated Outline

Affected Environment

Resource Definition. Urban recreation resources include public and private lands and facilities accessible to the general public in an urban environment. The recreational resources considered in this Draft Plan/DEIS should include GGNRA lands and facilities. As a part of the region of influence, the Draft Plan/DEIS should also describe and consider local recreation resources, which are generally considered within about 10-15 miles, or 30 minutes travel time, from the GGNRA lands that are the subject of the proposed action.

Project Setting. This section would describe the existing recreational lands and opportunities available to the diverse group of visitors of the GGNRA. Examples of such opportunities include dog walking, hiking, running, biking, picnicking, surfing, windsurfing, kite boarding, kite flying, etc. It would also describe the facilities available to park users, including restrooms, visitor centers, water fountains (for humans and dogs), cafes, and trails, including ADA-accessible trails. This section would also describe the local recreational resources within the region of influence, including city, county, and state parks, open space, and other recreation resources. The EIS should characterize the recreation opportunities available within the region of influence, and in particular the dog recreational opportunities available. To the extent feasible, the section would quantify the current acreage of land dedicated to the various recreational opportunities, both with the GGNRA and within the region of influence. The section would also include a summary of the history of the original recreational purpose and mission of the GGNRA and related acquired lands. All of this information is necessary to establish a reasonable baseline to enable a comprehensive analysis of changes from baseline conditions.

Regulatory Setting. This section would describe relevant policies and regulations related to recreation, and specifically relevant to dog recreation. The EIS should describe for both GGNRA and local parklands within the region of influence. Some of this information needed in this section is provided elsewhere in the document, but should be provided here. Any city, county, or state recreational plans or policies should be described in this section.

Environmental Consequences

Significance Criteria. Impacts to recreation resources could be considered significant if they result in a decline in the quality of existing recreational opportunities or in the quantity of available recreational lands/facilities.

Alternatives Analysis. This section should describe and evaluate the **direct impacts** of each alternative on existing recreational uses of the GGNRA and the surrounding urban environment for all types of park users, including impacts that substantially impair or diminish the features, attributes, or activities currently available to local residents. The impact analysis should consider the context and intensity of the proposed action, giving due consideration to the unique characteristics of the GGNRA, including its proximity to a dense, urban environment. The analysis should consider the ways that city and suburban dwellers use and need recreation areas. For example, many people, including seniors and children, rely on the GGNRA for access to unique recreational areas to walk and exercise themselves and their dogs as well participate in special events. Many urban residents are only able to have a dog and provide it an adequate quality of life because of the nearby recreation resources that the GGNRA provides. This connection between the GGNRA and the human environment needs to be disclosed. The analysis should consider the potentially adverse direct impacts of proposed action related to the loss of established recreational opportunities and how that loss would affect city dwellers and other park users who traditionally exercise themselves and their dogs in the GGNRA. Such impacts could include decreased health of these people and their dogs.

The section should also describe and evaluate the **indirect impacts** of the alternatives on areas in close proximity to the GGNRA, including indirect impacts that substantially impair or diminish the features, attributes, or activities currently available to nearby parkland visitors. Although the Visitor Use and Experience analysis provides some information on indirect impacts on nearby parkland, it fails to provide a detailed evaluation of the potential for an increase in visitor use of nearby recreational facilities. Such an increase in visitor use could lead to a decrease in visitor enjoyment of those areas, an increase in enforcement issues, and/or other related environmental effects. In addition, the Visitor Use and Experience analysis related to indirect effects on nearby parklands fails to provide a reasoned explanation for its conclusions. For example, on page 1412, the draft EIS states that the impacts on nearby parks under Alternative D, which prohibits dogs in the parking and picnic areas at Stinson Beach are negligible and “minor.” Given that dogs would no longer be allowed in these areas under this alternative, it is unclear how the EIS authors determined this impact to be negligible and “minor” without a rational explanation for this conclusion. Not allowing dogs in areas where dogs were they were allowed previously would indeed affect the use of adjacent recreation areas and the EIS needs to disclose this impact. Thus, the recreation resources section of the draft EIS should consider impacts related to the loss of recreational opportunities and access to nearby recreational facilities with detailed explanations for all conclusions.

This section should also evaluate the **cumulative** loss of established recreational opportunities and access to recreational facilities, especially within the context of a dense urban environment. The analysis should consider the contribution of the alternatives to this impact, both directly and indirectly. The list of cumulative projects should include a comprehensive list of past, present, and future actions that could affect recreational opportunities, including on- and off-leash dog walking, in the vicinity of the GGNRA. For example, this list should include the proposed San Francisco Natural Areas Management Plan, which includes the closure of up to 20 acres of land within San Francisco to dog walking. Coupled

with the proposed action, these actions constitute a major, adverse cumulative impact on dog walking opportunities in a dense, urban area, requiring mitigation.

For significant adverse effects, the NPS should commit to mitigation of major adverse impacts. For example, the NPS should consider alternatives that employ environmental design principles to manage access to and use of recreational trails in a manner that avoids conflicts among competing uses. Environmental design is one key alternative way to meet the purpose and need of the GGNRA as it would allow the NPS to recognize that the GGNRA is an urban recreation area that serves a different needs and purposes than other NPS lands.

Appendix C

Additional Comments Related to Appendix G, “Law Enforcement Data”

Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, “Law Enforcement Data” (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. Per NEPA, “Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (CFR 1502.24).” The findings of an EIS must be based on scientific accuracy and clear evidence in the record. This Draft Plan/DEIS is significantly flawed in that it does not rely on adequate evidence for the conclusions it draws, and in that it fails to clarify its methodology for drawing those conclusions.

The Appendix G reference document consists of a two-page summary of the numbers of incidents for two years (2007 and 2008), organized by incident type and location. The document does not provide rationale for why it chose those two years as being representative of existing conditions. The reference document is lacking in terms of only providing a very limited number of years of data. Moreover, it is inadequate in that it only contains numbers. Thus, Appendix G fails to provide any details or context for the incidents; nor does it contain any source documentation or records of communication. For example, the table shows how many “leash-law” violations occurred in a given area of the park per year, but does not provide the context of specifically where the incidents occurred, or provide context in terms of how many visitors visit the park, or otherwise provide a method to assess the significance of the number of incidents. In the instance of “bite/attack” or “disturbing wildlife” incidents, no details regarding the nature of the incident, its severity, or where it occurred are provided.

Any material incorporated by reference into an EIS should not only be cited but also summarized. The Draft Plan/DEIS fails to summarize the data provided in Appendix G, nor does it attempt to clarify the methodology for how it drew its conclusions based on the data presented.

Appendix G also noted that the violations recorded for the incidents of concern (i.e. bite/attack, closed area, disturbing wildlife, and hazardous condition/pet rescue violation types) appear very low, especially in consideration of the assumed large number (estimates of this should be provided in the Draft Plan/DEIS) of dog-walking visitors that visit the park each year. Given the relatively low numbers of serious violations recorded, it is difficult to understand how the NPS can support its findings that major dog conflicts exist in the GGNRA.

NEPA further requires that, “When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking (CFR

1502.22).” When information is incomplete or unavailable, the agency must obtain the information, unless the cost to obtain the information is unreasonable. In that case, the EIS must state that the information is incomplete or unavailable and identify the relevance of the unavailable information to the evaluation. The Draft Plan/DEIS does not acknowledge the incompleteness of the data provided, or in any way factor in the limits of the available data to the findings made.

Appendix G is used as the basis for numerous claims throughout the document, as well as to support findings of adverse impacts. Appendix G is referenced 48 times in the document, in Chapters 1, 3, and 4. Resources topics relying on Appendix G for findings of issues with existing conditions and/or adverse impacts in the environmental consequences section include Visitor Use & Experience, Health & Safety, Park Operations, Special Status Species, Wildlife, and Vegetation. In the following paragraphs are some examples of how this source document is misused, and as a result, the document’s findings are flawed.

In Chapter 1, background information and a preliminary discussion of in the current dog issues is provided. In this section, the document indirectly references Appendix G (the citations are not provided, but the statements are in line with those made in later sections of the document relying on Appendix G). For example, on page 5 the document states, “At the same time, the number of conflicts between park users with and without dogs began to rise, as did the fear of dogs and dog bites or attacks.” No reference for this statement is provided; therefore, it can only be inferred that it is based on the only referenced material that characterizes dog incidents – Appendix G. The statement erroneously implies that there was a rise in the number of conflicts and attacks; however such a conclusion could not possibly be drawn from the two years of data presented in Appendix G. Moreover, Appendix G indicates that a majority of “incidents” are leash law violations, and comparatively, there were relatively small numbers of bites/attacks recorded. Lastly, no source documentation in the Draft Plan/DEIS substantiates that the “fear of dogs and dog bites or attacks” is on the rise.

On pages 19-20, in the Employee, Visitor, and Dog Health and Safety section, the document recounts data provided in Appendix G (though does not cite it), and characterizes dogs as a major health and safety issue in the GGNRA. For example, “At GGNRA, reported incidents of encounters with unruly/aggressive dogs include instances of visitors being knocked down, intimidated, and bitten by dogs. In 2007/2008 a total of 52 violations were given for dog bites or attacks at the GGNRA park sites as recorded by GGNRA LE and U.S. Park Police.” The Draft Plan/DEIS characterizes dog attacks as a significant issue. However, the number of violations provided is aggregate over a two-year period, and cumulative over all the areas of the GGNRA. It would be much more appropriate to assess the issue on a site-by-site basis. Further, as noted before, no methodology on which to base the significance of these numbers is provided, or context (i.e. number of incidents relative to the number of visitors per year).

On pages 229-230, the document states, “In addition to vegetation and wildlife management activities, the park collects data regarding the frequency of disturbance to wildlife and habitats at GGNRA sites. Wildlife species and their habitats are currently being affected by dogs at this park, which has been documented by reports taken and warnings and citations issued (all referenced to as incidents) related to dogs in closed areas and disturbing wildlife at GGNRA (appendix G).” The conclusion that wildlife and habitats are “currently being affected by dogs at this park” cannot soundly be based on the numbers

provided in Appendix G. Appendix G does not provide evidence of what type of disturbances have occurred, or the level of significance that the documented disturbance actually has. Again, a methodology for how the document drew its conclusions based on the data presented must be presented.

On page 242, the document states, "Off-leash dogs have frequently been observed in Redwood Creek and Redwood Lagoon despite these closures (NPS 2008c (appendix G))." This statement (and other similar statements made in the Draft Plan/DEIS) is based on subjective opinions and untested assumptions. The statement that off-leash dogs have frequently been observed in these areas is unsupported by the evidence in Appendix G. Further, the word "frequently" is broad and vague and not meaningful in this context given that the data in Appendix G is only based on a years' worth of observation in 2007 and unsupported by records of communication. There is no methodology provided on which to base the significance of the data presented.

On page 253, the document finds that, "Both on- and off-leash dogs are routinely brought into the WPA by park visitors..." This statement is not referenced, but later in the paragraph the document does cite the warnings and citations included in Appendix G. Again "routinely" is a subjective qualification, and no methodology for determining the level of significance of the data provided is clarified.

Similarly, on page 254, the Draft Plan/DEIS states, "However, despite education and enforcement efforts, current compliance with the 2008 seasonal protection rule remains low, as described in the "Vegetation and Wildlife" section and the "Visitor Use and Experience" section under "Visitor Use by Dog Owners" (NPS 2008c (appendix G)). The Draft Plan/DEIS fails to provide the reader with a means of distinguishing between scientific evidence and subjective opinion. Contrary to the cited statement, no violations of the Ocean Beach SPPA are listed in Appendix G for 2007 and only 2 violations were cited in 2008. For Crissy Field, 17 violations were cited in 2007 and no violations in 2008. The NPS provides no basis for determining that this constitutes "low" compliance. The Draft Plan/DEIS must provide the reader with a methodology for determining the significance of the data.

On page 250, the Draft Plan/DEIS states, "However, these closures are not always followed; a citation was issued for a dog in the creek in 2006 (NPS 2008c (appendix G))." This statement is inaccurate/unsubstantiated since the data in Appendix G is from 2007.

On page 496, the Draft Plan/DEIS states, "Dogs are currently prohibited in the tidal marsh at Crissy Field. Despite protection of restored tidal marshes by installed fences, dogs under voice control have been documented as gaining access to the tidal marsh through the tidal inlet that allows exchange of water between the tidal marsh and San Francisco Bay (Appendix G)." Appendix G provides no documentation of dogs in this specific area. Source documentation, containing details of incidents, must be provided to support such claims. Further, the discussion continues to imply that incident of dogs going into this area is a significant issue, and this is further unsubstantiated. The document needs to include appropriate analysis of the data to determine that a dog going into this area is a regular enough occurrence that it is determined to be a substantial issue. This consideration of the data has not been provided, and as such, the analysis is subjective, and the conclusions unfounded.

On page 568, the Draft Plan/DEIS states, "In addition, 17 incidents of dogs in closed areas were recorded in 2007/2008 (Appendix G)...In the restored dune areas, the shifting sand buries the fences, and dogs have accessed dune areas; there are also sparsely vegetated foredunes that have formed in the WPA that are frequently trampled by dogs." Again, Appendix G contains no details of the dog violations in the WPA. There is no evidence provided for the conclusion that dogs "frequently" trample the dunes. There is no evidence provided that any of the 17 incidents over the two-year period involved dune trampling. Moreover, even if there were evidence provided to that effect, 17 incidents in two years could not be considered "frequent." Again, methodology for interpreting the data and determining the significance of the data needs to be provided. Without this, the findings made are purely subjective claims.

On page 1631, the Draft Plan/DEIS states, "Due to the history of citations and warnings given for visitors neglecting the current regulations, confrontations between visitors and staff would be expected due to the restriction of all dogs from the site. It is anticipated that confrontations would be intense, which would place staff at a greater risk of injury. Due to the history of noncompliance and confrontation at this site, impacts on park staff during the initial education and enforcement period would be short term, moderate, and adverse." This quote is another example of how the Draft Plan/DEIS subjectively mischaracterizes the data presented in Appendix G. The conclusions make a presumption of significant confrontations, which is not at all evident from the data provided. Moreover, it mischaracterizes noncompliance as a significant issue, without providing any rationale on how that determination was made. The document makes inaccurate and unsubstantiated conclusions based on information presented in Appendix G.

The examples above are not an exhaustive list of all instances where Appendix G is misused, but a sampling of the types of errors that were found in the document's reliance on Appendix G. In conclusion, Appendix G does not provide substantial evidence for many of the claims it makes, and as such, the analysis of environmental consequences is flawed. The NPS should revise the Draft Plan/DEIS and its findings in the following ways:

- Provide details for incidents in Appendix G (specific location, nature of incident) and source data.
- Where the first reference to Appendix G is made, the document should not only reference but also summarize the data contained therein.
- Clarify why 2007/2008 years were chosen.
- Provide data for a broader range of years.
- Provide methodology for interpreting/determining the significance of the data. The NPS should provide thresholds for analyzing the incident date, by type, and by GGNRA site. The NPS should clarify what number of incidents is considered acceptable or unacceptable, again, by site and by incident type. The NPS should describe their rationale for determining proposed thresholds (i.e. in context of number of visitors per year to each site). By providing a methodology for analyzing the data shown, the EIS will be able to properly describe the significance of the data, and use the data to support (or not support) its findings.
- Provide clear evidence in the record to support all of its findings. The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS.

- Review all instances where Appendix G is referenced in the Draft Plan/DEIS and make revisions to ensure the findings are based on clear evidence in the record. Revisions to the methodology, the analysis, and the findings, as noted above, should be to be corrected throughout the entire document, wherever such analysis or conclusions relies on the data in Appendix G.
- The NPS should take all reasonable steps to obtain and disclose the information that the Draft Plan/DEIS is currently lacking. Where there is incomplete or unavailable information, the Draft Plan/DEIS must clarify that the data is lacking, and identify the relevance of the unavailable information to the evaluation, and especially to the analysis of environmental consequences.
- As a result of the revisions to the analysis and findings noted above, the analysis of the alternatives needs to be reassessed where proposed alternatives are not substantiated by clear evidence in the record. Proposed management measure such as closures or significant reductions in access to people with dogs in areas of the GGNRA should be revised. As currently written, the data provided in Appendix G do not support the management measures proposed in the document, and therefore the alternatives need to be modified.

Appendix D

Additional Comments Related to Draft Plan/DEIS Analysis of Geology and Soils

Chapter 3: Affected Environment

General:

Table ES-1 lists only areas open to dogs under Alternative A. Although this may simplify the comparison among alternatives (since the closed areas would remain closed under all of the alternatives), it does not clearly portray the existing extent of areas closed to dogs. Not only do the alternatives variously restrict dogs compared to the No Action Alternative, but they also increase restrictions on dogs relative to a baseline that is already restrictive. The Draft Plan/DEIS and Table ES-1 should compare the alternatives in terms of the area and miles of trails available to dogs under each alternative. This is a less subjective way of presenting the alternatives, and it could be useful in evaluating cumulative and synergistic effects. For example, Alternative C takes other available dog use areas within each county into account, presumably in recognition of the high demand for areas where people can take their dogs, and the desire to avoid over-concentrating dog use in any one area. Presenting the alternatives in terms of available area and trail miles would better allow the reader to appreciate the future impacts relative to current conditions.

Executive Summary, Environmental Consequences, pages xv-xxiii:

Page xv (Stinson Beach). The paragraph states that impacts to physical resources (including soils and geology) would generally range from negligible to long-term, minor adverse for all alternatives. However, dog use at Stinson Beach is limited to the parking lots and picnic areas only, under each of the alternatives. Although “minor” is less than “moderate,” and “moderate” is less than “major” or “significant,” making the distinction between the impacts of No Action and action suggests that the action alternatives would actually alter the situation, when actually no change in management is proposed. This bias of weighting the analysis in favor of excluding or limiting dogs exists uncritically throughout the Draft Plan/DEIS and should be corrected.

Table 5. Environmental Impact Summary by Alternative, pages 109-211:

Page 109 (Stinson Beach, Soils and Geology). Under Alternative A the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Furthermore, each of the statements in the

first bullet, except for No Action, includes the clause “assuming compliance,” conveying the understanding that perhaps compliance can’t be assumed under No Action. At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action.

In the same table, under Alternative D, in the rationale for a finding of “no impacts,” it is concluded that because no dogs would be allowed within the parking lot and picnic area, no soil would be disturbed. This interpretation fails to take into account soil disturbance caused by people using the site, regardless of whether dogs are present. (Continuing this reasoning, and referring to Maps 2A and 2D, the reader might be lead to the conclusion that the impact would be greater under No Action than under Alternative D because dogs would be allowed in the blue-shaded area of Map 2A, whereas there is no blue-shaded area in Map 2D, when in fact the difference in effects on soils between these alternatives may be so miniscule as to be unnoticeable compared to the impacts of human use regardless of the presence of dogs).

The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on compacting the soil in a picnic area than the force exerted by even a large 70-pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard (and acceptable in many areas of a National Park), compared to dog use, unfairly and uncritically biases the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded. The Draft Plan/DEIS should attempt to provide illumination, rather than justification for a foregone conclusion.

Table 5. Environmental Impact Summary by Alternative, pages 109-211:

Page 112 (Homestead Valley, Soils and Geology). Under the No Action Alternative, it is concluded that there would be long-term adverse impacts from “soil compaction, erosion, and nutrient addition... in areas off the trail since dogs would be under voice control,” while under other alternatives it is concluded that the impacts would be negligible because dogs would be under physical restraint. This is an unsubstantiated assumption in support of the underlying bias of the analysis. The analysis does not connect intensity of use and impact and seems to be based solely on the incorrect assumption that humans and wildlife would have no impact on off-trail areas, and that all impacts can be attributed to dogs. The analysis assumes, without the support of any evidence, that each of the options (off-leash, on-leash, no dogs) must result in a differentiable impact on soils and geology. This in turn requires the use of different adjectives to express the assumed differences. Instead, the impacts of dogs should be evaluated realistically and in context. If no positive basis can be identified for finding a difference between the impacts, then the Draft Plan/DEIS should conclude that the impacts would not differ. In most areas, this is the only realistic conclusion. It should not be assumed that the imposition of more

rules will lead to fewer impacts. And yet this is apparently the assumption underlying the soils and geology impact analysis.

Table 5. Environmental Impact Summary by Alternative, pages 109-211:

Page 115 (Alta Trail, Orchard Fire Road and Pacheco Fire Road, Soils and Geology). The same sort of bias exhibited in the analysis of Homestead Valley and Stinson Beach is exhibited in the analysis of the Alta Trail, and of every other area. The differences among the alternatives are not justified, and have no foundation other than perhaps the apparent editorial preference to break up the monotony of the impact analysis. For the Alta Trail, long-term moderate adverse impacts on geology are identified under the No Action Alternative, apparently in accordance with a general policy that says that dogs under voice control must, by definition, have measurably greater impacts on soils and geology than dogs on-leash, and that there would be no impacts to the environment at all if dogs were excluded from the park altogether. This policy is applied across the board, without reference to location or underlying soils and geological conditions. The possibility that the impacts of all of the alternatives on soils and geology might be indistinguishably small has not been considered. Yet it stands to reason that pedestrians and vehicles using a fire road, not to mention the impacts of natural processes such as wind and water erosion and insects and wildlife, would have a substantially greater impact on the soils and geology than the introduction of dogs that people might bring along with them as companions on their walk. Is there really any reason to expect that allowing dogs off-leash during daylight hours would result in any greater impact than allowing deer and coyotes to roam the area after the gates are closed?

Chapter 3: Affected Environment. Soils and Geology, pages 222-226:

General Comments

1. The Affected Environment discussion is overly general and does not provide a basis for understanding the impact analysis and evaluating the alternatives (40 CFR §1502.15). There is a discussion of plate tectonics, which has no apparent bearing on the relevant issues for dog management. Among the discussion of the complexity of the geologic environment is a statement that "soft formations are highly susceptible to...damage fromdog use." This is a gratuitous statement that does nothing to illuminate an understanding of the issues and serves to illustrate the bias of the analysis to come. This is followed shortly by the statement that "dune systems...are also very susceptible to artificial disturbance..." (read "by dogs"). To the side is a photo of a portion of what appears to be a trail through the sand bluffs at Fort Funston, with numerous tracks. The tracks look chaotic and the message conveyed by the photo and the text is that dogs are impacting this fragile environment. This is propaganda, not science.

This Draft Plan/DEIS is about making a change to rules about dog use. Therefore, in order to be useful in this regard, the Affected Environment discussion must present information about how the environment has been impacted by dogs, and not just by dogs but also by humans. The Draft Plan/DEIS does not present baseline conditions that require a change in the rules. The Affected Environment discussion is silent. Perhaps an aerial photo of the bluffs at Fort Funston and the adjacent areas would help to provide perspective and tie in the discussion of plate tectonics and landforms. An aerial photo would indicate that these bluffs are undergoing slope failure and rapid erosion on a very large scale, such that the localized contribution from humans and dogs is

insignificant. The impacts on geology should be presented fairly and impartially, with an eye toward using the information provided in the Affected Environment section as the foundation for the impact analysis and alternatives comparison. As it is written, the Affected Environment is little more than a catalogue of the soil complexes of Coastal California, which the reader can obtain from the internet or from browsing through *Roadside Geology*.

2. The Affected Environment section contains frequent allusions to generalized impacts that can be caused by dogs. For example, under the section headed "Alteration of Park Soils" is the statement at the end of the first paragraph that "Trampling and digging by dogs can lead to accelerated erosion of cliffs and dunes at GGNRA sites, which can also be exacerbated by high visitor traffic." This is an example of a truism. So, too, can and do gophers and rabbits contribute to accelerated erosion of cliffs and dunes, but the GGNRA is not proposing to put gophers and rabbits on leashes. The operational concern in this document is the issue of whether any noticeable change in the overall rate of erosion will occur as a result of a change in the dog management strategy.

Regardless of whether dogs are allowed on the bluff trails to the beach at Fort Funston, the GGNRA is going to have to address the coastal bluffs during a winter storm or as sea levels rise and erode the toe of the slope. One look at the aerial photo might put the notion of maintaining stasis into budgetary perspective. Instead of presenting truisms, the Affected Environment should provide the reader with information that would help dog walkers understand that taking an alternative route to the beach would have some beneficial effect on soils and geology. In fact, non-native Americans have been impacting the coastal dunes and bluffs for more than a hundred years. Perhaps, from a geological perspective, it is no coincidence that there is a broad, sandy beach below Fort Funston. Is the beach broader, or less broad, as a result of dogs accompanying their owners on the trails to the beach? The Affected Environment should discuss and put into perspective the impacts that past uses have actually had and not leave off stating that the sand is soft.

3. The discussion of soils is especially generalized in the Affected Environment section. However, it suggests that within some of the sites there are specific areas underlain by fragile or vulnerable soils that could be impacted by uses, including dogs. In order to be useful, maps are needed that would indicate the areas of these vulnerable soils, as well as the areas with steep slopes that are prone to accelerated erosion. This information would also help to support the discussion of vegetation and perhaps other sections of the Draft Plan/DEIS. The soils maps should indicate the trails. If possible, areas of existing impacts should be portrayed. Maps would not only give the reader the ability to locate the vulnerable areas relative to use areas, but also to understand the size of these areas relative to the size of the areas where change in management is proposed. Areas of serpentine soils should be specifically shown on the maps, because they are called out in the text.
4. *Rare Soils at Golden Gate National Recreation Areas, paragraph 2, page 225.*
The text indicates that serpentine soils can be found at certain locations that are listed. This suggests that these are the only locations where serpentine soils are found, and that should be clarified. The locations listed are Muir Beach, Crissy Field, Baker Beach, and Lands End. Showing these areas on a map would be helpful. In addition, it would be helpful to elaborate on which current dog use areas are specifically affected and why. At Muir Beach, for example, the serpentine soils are outside the study area. The Draft Plan/DEIS should discuss serpentine soils at Muir Beach and other sites only if the information is directly relevant to the study area and the impact analysis.

At Crissy Field, the text says that serpentine soils are adjacent to Marine Drive. Marine Drive is labeled on Map 11-A (Fort Point) but not on Map 10-A (Crissy Field). If the area of serpentine soils is limited to the vicinity of Marine Drive at Crissy Field, then this is important information that should be presented graphically in the Draft Plan/DEIS. Later, the EIS states that the preferred alternative for Crissy Field is Alternative C, which does not appear to provide any additional protection for the area of serpentine soils than does Alternative A. The Affected Environment section should provide enough information for the reader to understand why this should be the case, rather than implying that the presence of serpentine soils is always a reason for altering the dog management strategy. This information needs to be site specific, not generic background, so that alternative management measures can be developed and adequately evaluated.

At Baker Beach, the text says that serpentine soils are located on the coastal bluffs between Baker Beach and the Golden Gate Bridge. Looking at Map 12-A, it appears that this might be the area containing the trail to Battery Crosby. Under the preferred alternative (Alternative D), this trail would be closed to dogs. Presumably the closure to dogs is related to the environment supported by these soils. The Draft Plan/DEIS should provide some discussion of the nature of the actual impacts associated with dog use that may have occurred in this area. In the Impacts discussion (p. 376-377) there is no mention of any existing impacts by dogs, and the proposed closure seems to be to prevent future impacts rather than to correct existing ones. Given the mention of these soils in the Affected Environment section, it would be helpful to clarify this. Furthermore, the title of the reference cited, *Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula* (USFWS 2003), suggests that some evaluation of this area may have been done prior to that time, which could be described in the Affected Environment section.

The text says that serpentine soils are present at the western end of the Lands End site, *near Fort Miley*. Given that Fort Miley is large, understanding more precisely where these soils are might greatly assist in understanding the selection of the preferred alternative (Alternative D). The vegetation community's map (Map 22) is at a scale that is not helpful in this regard. As with Baker Beach, the Impacts analysis (page 391) does not indicate that there are currently any impacts from dogs, and the preferred alternative seems to have been selected in order to prevent future impacts rather than to correct existing ones. This should be clarified in the Affected Environment section.

5. *Alteration of Park Soils (page 225)*

The second paragraph makes the assertion that:

“Dogs and dog walkers that do not stay on designated trails and venture off trail create social trails that become denuded of vegetation and result in increased soil compaction. This has occurred at Homestead Valley, Alta Trail/Orchard and Pacheco fire roads, Oakwood Valley, Marin Headlands, Baker Beach, Lands End, Fort Funston, Mori Point, Sweeney Ridge/Cattle Hill, and Pedro Point Headlands.”

This is an important assertion and is presumably supported by observation. Yet no citations to report more specific information than the list of sites are presented. The area included within the areas mentioned above is quite large, and the subject is compaction of soils. It seems possible that the threshold for inclusion on this list is that dogs or dog walkers have created a social trail within one of these sites. It would greatly assist in understanding the need for the proposed changes in dog management if more specific information were provided. Furthermore, the sentence preceding the

one about dogs and dog walkers says that “Soil compaction is common along social trails that have been created by – and are heavily used by – bikers, hikers, runners, and dog walkers.”

Based on the information presented, it is not at all obvious that the solution to the problem of social trails would be to change the rules affecting dogs. Somehow, the image of a group of dogs creating a social trail that results in soil compaction and vegetation loss seems less compelling than the image of runners, bikers, and hikers creating social trails that become visible and continue to be used by subsequent runners, bikers, and hikers. The Draft Plan/DEIS doesn’t describe where dogs actually fit into this process, and how restrictions on dogs would reduce the use of social trails by runners, bikers, and hikers. The problem is that the assertion is just an assertion. Environmental impact statements are required to be supported by evidence that agencies have made the necessary environmental analyses (40 CFR §§1500.2(b) and 1502.1)

In theory, it sounds reasonable that dogs contribute to soil compaction. But there is no evidence that restrictions on dogs would reduce these impacts, and that management restrictions that target runners, bikers, and hikers to prevent them from creating or using unauthorized social trails wouldn’t be vastly more effective in preventing impacts than restricting dogs. More specificity is needed to enable the reader to understand and meaningfully comment on the impact analysis and alternatives. It is possible that agency and public reviewers may alter whatever pre-conceived notions they may have in regard to the causes of soil compaction and vegetation loss, the creation of social trails, the extent of the problem, and the relative benefits of restricting dogs, or they may propose better alternatives for addressing documented impact, which is a fundamental purpose of the NEPA process. “The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.” (NEPA Rules - Purpose - 40 CFR §1500.3).

The third paragraph cites a publication of the Connecticut River Coastal Conservation District (CRCCD 2009) in regard to dog waste as a source of nutrients in soil. Current CRCCD publications do identify dog waste as a significant source of nutrients to water bodies, and suggest that picking up the waste will alleviate or prevent the problem. However, it does not appear that the CRCCD publications currently available are concerned with the contribution of nutrients to soils as a problem that could alter the fertility of soils. Furthermore, while the theory that dog urine might increase soil salinity seems vaguely possible, the idea that it would have a significant impact in areas adjacent to the coast that daily receive aerosol droplets of sea water seems unlikely. Certainly, it seems likely that serpentine soils would require more intensive fertilization by dogs than currently occurs in order to justify a lengthy paragraph on this subject in the EIS. The previous comment regarding illustrating the areas containing serpentine soils applies to this issue as well. Based on the information provided, it does not appear that intensive dog use occurs in the small areas containing serpentine soils. Unless better supported or more focused on the specific areas where it may occur, the discussion of impacts of dog use on soil chemistry should be abandoned, and replaced with more substantive discussions of the Affected Environment.

Chapter 4: Environmental Consequences. Soils and Geology, pages 291-458:

General Comments

6. Study Area (page 291)

The study area is defined as “the area that could be impacted by dog management activities...” Presumably, this means the entire area within the green line boundaries shown on the maps. However, in practice, the focus of the analysis should be on the specific areas affected by the alternatives, where impacts from dogs may change. In most cases, this is small percentage of the total park areas. Contrary to the statement in this paragraph, the individual study areas have not been described in detail in Chapter 3. It would be helpful to clarify that the alternatives would alter management in selected portions of the study area, and as indicated in earlier comments, to quantify those areas in terms of acres and miles of trails affected by management.

7. Duration of Impact (page 291)

As described, the duration of impact does not seem to apply to the No Action Alternative. While this may seem like a small matter, it appears to be based on the unstated assumption or bias that the No Action Alternative is not feasible. It may be accurate to state that the existing conditions will continue during the education and enforcement period of an adaptive management plan. However, the assumption that impacts will become long-term (described as persisting for the next 20 years) is also not supported, given the lack of specific information on the Affected Environment and Environmental Consequences sections, as explained in these comments.

8. Assessment Methodology (pages 291-292)

This section explains that professional judgment was relied upon in determining impacts, due to lack of site-specific scientific data regarding effects of dogs on soils within the GGNRA. However, in the last paragraph it is asserted, as an example of processes that would occur as a result of various management activities, that heavy dog use can interrupt natural dune processes and accelerate coastal bluff erosion. The choice of words (would, can), the degree to which professional judgment is involved versus knowledge of the impacts that dogs do have versus those that they can have, and the lack of quantitative analysis overall, is confusing. Even the reference to lack of site-specific scientific data is unspecific in its scope. Although there are degrees of reliability of data, methods can be found to do a better job of quantifying the existing impacts of dogs.

For example, on a busy weekend day, it should be possible to observe and report on the areas of intense human and dog use. It should be possible to overlay maps of soils, outcrops, slopes and slope failures, and relate those to the areas selected for evaluation of different alternatives. Some, if not all, of the areas of damage could be identified and mapped, rather than relying on broad statements about the types of impacts that are possible. These methods should be attempted, and a more sophisticated methodology designed than strict reliance on “professional judgment” that appears to be the foundation for the impact analysis. Because this information is essential to a reasoned choice among alternatives and is obtainable without exorbitant cost, it is required to be included in the EIS (40 CFR §1502.22(a)).

9. Impact Thresholds (page 292)

The impact thresholds are critical to the outcome of the analysis, and the impact thresholds described in this section provide a great deal of leeway to the analyst. In the first paragraph, a beneficial impact is defined as “a positive change in the condition or appearance of the resource.” Presumably, an adverse impact would be a negative change in condition or appearance. However, no further explanation is provided as to how appearance of soils and geologic resources should be considered. The photo of the footprints in the sand on the bluffs (page 222) at Fort Funston provides an ominous clue as to how the appearance of the resource might influence the analysis. As discussed in an earlier comment, the photo is used to illustrate the soft sandy “soils” on the bluffs,

which are obviously easily eroded by hikers, dogs, rodents, and reptiles. If appearance is a threshold criterion, then more footprints, however short-lived, could easily be equated with greater adverse impact. If appearance of soils is to be used as a threshold criterion then a great deal of discipline must be exercised by the analyst to avoid any tendency to associate footprints in sand with an adverse impact on soils and geology. It would be preferable to avoid the appearance criterion altogether, and to provide a more thoughtful definition of what exactly constitutes a "change in condition" of soils (whether adverse or beneficial).

Later the section explains that changes are to be evaluated in comparison to the "current condition" of the resource. Since the current condition of the resource has not been discussed or defined in Chapter 3, this change would presumably be observed during the monitoring period described under the preceding discussion of the Duration of Impact, in which it is stated that "it is expected that compliance with the dog walking regulations and associated adverse impacts would improve gradually..." As noted in comments on other sections, compliance should be part of every alternative and is not a basis for discounting Alternative A.

Considering that baseline conditions have not been quantified in Chapter 3 for any of the sites, have barely been discussed, and where discussed, have been discussed in a general, impressionistic, and broadly theoretical way (relying on suspect concepts such as the alleged adverse effects of dog urine on the salinity of poorly-defined areas of serpentine soil in a coastal marine environment, based on a brochure misapplied to this project that was prepared by a Connecticut agency to encourage visitors to pick up their dog's waste), this section does not critically evaluate available data and is not supported by evidence that the necessary analysis has been prepared. .

As revealed in the subsequent section (Potential Soil Impacts Common to All Alternatives), three types of impacts on soils and geology are identified, (although they all seem to be related to soils, so the addition of "and geology" is superfluous from this point forward). These are: soil disturbance; soil compaction and erosion; and soil function. Given that these are to be the attributes by which soils and geology are evaluated and the alternatives are to be compared, it would be helpful if these attributes were defined, preferably within the discussion of Impact Thresholds. It would also be useful to see, in the Affected Environment section of the EIS, a discussion of the current condition of soils in the study area based on these attributes and particularly as they might related to patterns of past dog use. It is also necessary so the reader can understand the impact attributable to dogs or other factors, so that the appropriate alternatives can be developed that are actually related to the impacts, and management measures can be evaluated for their likely effectiveness.

As discussed below, lack of a definition or bounds on what constitutes adverse soil disturbance is a weakness of the analysis, which might either be rectified by carefully defining the term, or by avoiding its use altogether due to its inherent vagueness.

Soil compaction and soil erosion are distinct processes, though their causes and secondary effects may overlap. This might become clearer if each were defined. To conclude that in general, a decrease in soil erosion would be considered beneficial is far too simplistic. Under natural conditions, erosion is essential and inevitable on every surface exposed to weathering. Like wind and rain, rates of erosion can vary widely over time, as well as by material and location. For example, areas with rapid natural rates of erosion, such as the bluffs at Fort Funston, tend to support fast-growing, resilient vegetation. There are hollows and landings within the bluffs that are stable enough to support trees, but most exposed slopes fail so frequently that trees cannot

become established on them. To simply assert that a decrease in erosion at Fort Funston would be a beneficial impact is not meaningful. The Impact Thresholds discussion should provide greater clarity. This level of specificity is also needed to consider, for example, why off leash dog access is prohibited even on an inland trail.

Soil function is a potentially broad category, which certainly needs to be defined for the average reader, and might be conceived to include every attribute of soil. Soil has many functions, among which is to supply material that eventually becomes beaches. Among the important ecosystem functions of soil are supporting plant growth, providing habitat for an incredible variety of fauna, retaining moisture, and breaking down organic waste. Under natural conditions, because of their textures and locations, different soils support these functions to different degrees. Therefore, the impact that any particular use, such as dog use, may have on these soil functions depends on the characteristics of the particular soil as well as on the nature of the use.

10. Potential Soil Impacts Common to All Alternatives (pages 292-293)

It is not entirely clear what this section is intended to accomplish, and it would be helpful if there were a brief introduction in this section to explain what it is for.

11. Cumulative Impacts to Soils that are Common to All Alternatives (pages 292-293)

As with the preceding section, the purpose and direction of the cumulative impacts common to all alternatives discussion is unclear and unfocused. It does not discuss the cumulative effect of redistribution of dog use throughout the region in response to increased restrictions on dog use and changes in demographic patterns of dog ownership, which is perhaps the most important adverse cumulative effect.

As the document mentions, but fails to evaluate, impacts of dogs on soils is a function of the intensity of use. The discussion here should not ignore the concern of many readers of the Draft Plan/DEIS that a region-wide decrease in areas available for dog use accompanied by a higher demand for such areas, would concentrate dog use into increasingly smaller areas, resulting in greater intensity of use in those areas. This impact warrants discussion in the "common to all" section.

This may also be an appropriate place in the document to discuss the cumulative effects of the compliance-based management strategy, since the compliance-based management strategy is an integral part of the project alternatives. Increased restrictions and closure of areas due to noncompliance would further concentrate dog use in other areas, either within the GGNRA or outside the GGNRA. The Draft Plan/DEIS fails to address conditions that would result if, as a result of noncompliance, dog use is concentrated elsewhere.

12. Compliance-Based Management Strategy (pages 295-296)

The compliance-based management strategy discussion is part of the project description and should be fully described there. Although it is useful to reiterate the components of the strategy in the resource impacts section, the section here does not adequately focus on impacts on soils and geology. As explained in this section, the strategy would lead to increased restrictions on dog use if noncompliance exceeds threshold criteria measured by observation of noncompliance.

13. Marin County Sites – Stinson Beach (pages 296-302)

The following comments on the Impact discussion for the Stinson Beach area are generally applicable to all sites.

Alternative A: No Action (page 296).

The text states that there is low compliance with the no dog walking restriction on the beach and refers to Table 9 (page 271) as support for this assertion. The information provided in Table 9 and its accompanying text could just as easily be interpreted to support the opposite view, however, that compliance is exceptionally high given the intensity of use. It is unclear what effect on compliance the use of the adjacent beaches might have. (The text accompanying Table 9 incorrectly identifies the Marin County beach adjacent to Stinson Beach - called Upton Beach - as allowing dogs off-leash. Dogs are allowed on this beach on-leash.) According to its website, dogs are not allowed on the beach adjacent to the southeast of Stinson Beach (within Mt. Tamalpais State Park). However, this short stretch of beach is poorly accessible except from Stinson Beach or Upton Beach.

Under the compliance-based management strategy, future dog use might become more restricted if noncompliance is incorrectly or inappropriately assessed, possibly leading ultimately to imposition of restrictions like those under Alternative D. Even though, based on the impact analysis, the impacts on soils and geology would not drive decision-making at Stinson Beach; more thoughtful analysis would improve the impacts discussion, especially in relation to cumulative impacts.

Alternative A: No Action – Cumulative Impacts and Indirect Impacts on Adjacent Parks (pages 296-298).

The cumulative impact analysis over-simplifies when concluding that because long-term and ongoing restoration and enhancement efforts, etc., would be beneficial to soils and geology, that the cumulative impacts on soils and geology would be low. Instead, the cumulative analysis should also consider the potential for concentration of effects within smaller areas, especially in the event that noncompliance monitoring leads to greater restrictions being imposed on dog use at Stinson Beach and other areas.

In the Indirect Impacts section, the text identifies 33 parks within a 10-mile radius, and 3 within a 5-mile radius, making it seem as though there are numerous alternative sites for dog users. However, this is an oversimplification of the actual situation. The only park on the coast and within the watershed is Mt. Tamalpais State Park. A summary description of the dog use areas at Mt. Tamalpais State Park, from a website called DogFriendly.com, provides the following information:

“While dogs are not allowed on most of the trails, they are allowed on the Old Stage Road. This path is about .5 to .75 miles and leads to the Marin Municipal Water District Land, which allows dogs on their trails. Dogs must be leashed on both the state park and the water district lands.”

While this is certainly an option for some dog owners, it does not appear to provide anything at all comparable to the capacity or experience offered at Stinson Beach, and cannot be considered a reasonable alternative to Stinson Beach for most people with dogs. Therefore, although the cumulative impact section provides some mention of other areas, it does not provide a rigorous analysis of likely effects. Suppose, for example, that all of the people who are not able to walk their dogs on the weekend at Stinson Beach were to walk their dogs along the Old Stage Road at Mt. Tamalpais State Park. Very likely, the negligible impacts that currently apply to Stinson Beach would become significant impacts on the Old Stage Road. Furthermore, the management of these impacts

would be transferred from federal to state responsibility. In this regard, the Mt. Tamalpais web site provides this warning:

ATTENTION Service Reductions in Effect 12/1/2010 - 6/30/2011: *California State Parks is facing an unprecedented budget reduction and you may experience service reductions during your visit. We hope that our loyal visitors understand and appreciate the severe budget reductions that have occurred and help us minimize the cost impacts to the system.*

Because it is unlikely that Mt. Tamalpais State Park could accommodate these visitors, and also unlikely that visitors would substitute Mt. Tamalpais for Stinson Beach, the demand would be distributed somewhere else. A more realistic discussion of the role of Stinson Beach and other parks in meeting the demand for dog use opportunities is needed. Furthermore, the analysis of the indirect impacts on adjacent parks arbitrarily chooses to limit the range of other available dog use areas to parks. Instead, the discussion should include all public lands, and especially public lands within a similar area and environment, since those are the types of areas that visitors will be more likely to substitute if access is substantially reduced in given GGNRA units.

14. Marin County Sites – Homestead Valley (pages 301-307)

Alternative A: No Action (page 301)

The Homestead Valley impact analysis is the first unit in this section that presents a discussion comparing impacts of No Action (which allows off-leash use) with the action alternatives, (none of which now allow off-leash use). The text states that “Even though this site has low visitor use and low numbers of citations and incident reports related to dog activities, soil compaction and nutrient addition and possible erosion from dogs is assumed to be currently happening along the fire road/trails and in off-trail areas throughout the site.” This statement indicates that no evidence of impacts of dog use is needed in order to conclude that the No Action Alternative has adverse impacts on soils and geology.

Similar conclusions reflect a bias at many of the other sites discussed. The discussion of the No Action Alternative is based on little or no data (as indicated by the lack of data provided in Chapter 3). The facts that are presented indicate that there is no justification for a change in management to protect soils and geology.

Alternatives B and C and E all describe compaction of soils within a strip 6 feet adjacent to the Homestead Fire Road as an impact on soils. Given the low use of the area, the low level of risk from some slight amount of compaction that may occur adjacent to a fire road, and the fact that the 6-foot strip assumes that the dogs walk directly alongside the owner, who walks at the extreme edge of the fire road, the extreme precision of this analysis is notably inconsistent with the general lack of specificity and precision presented in the discussion of the Affected Environment. Presenting the impact analysis in such precise terms gives the misleading impression that the analysis is more accurate and more certain than it is. This generally applies to fine distinctions made between the impacts of the alternatives. At the level of accuracy possible with the information available, “no impact,” “negligible impact,” and “minor impact” should probably all be considered synonyms with respect to soils and geology.

Appendix E

Additional Comments Related Draft Plan/DEIS Analysis of Water Quality

Chapter 3: Affected Environment

1. General – the Draft Plan/DEIS should include a map that shows both the locations all bodies of water discussed in the water quality sections and dog areas categorized by currently allowed activities. Add a “Marin County Sites Map”, “San Francisco County Sites Map”, and “San Mateo County Sites Map” showing both water resources for those areas and existing dog areas categorized by currently allowed activities.
2. General – there seems to be a lack of historical or current information connecting dog use of the parks to resulting changes to water quality. The Draft Plan/DEIS should provide site-specific information documenting this connection. For instance, the Stafford and Home report cited on page 227 attributes high bacteria and nutrient levels to five sources, in addition to dogs. At the bottom page 227, the Draft Plan/DEIS asserts that the eastern third of Crissy Airfield “receives a moderate to high level of use by off leash dogs and has substantial amounts of pet waste”, but there is no reference to support this claim. There is no site-specific analysis linking the presence of waste to documented water quality issues at this site and no objective monitoring data that supports a moderate to high use of off leash dog use in this area.
3. General – the water quality section in Chapter 4 discusses each of the 21 sites individually. The Draft Plan/DEIS should follow a similar format in Chapter 3. For example, provide a description and characterization of the water resources for each of the 21 sites.

Chapter 4: Environmental Consequences

1. General – the Draft Plan/DEIS should be clear under all of the analyses for Alternative A that the impacts would not be new, but rather a *continuation* of existing/ongoing impacts due to the existing approach to implementing the current GGNRA general management plan.
2. General – The Draft Plan/DEIS should also be clear in this and other sections that the impact analysis presented for Alternative A is different than the consequences of the No Action alternative were GGNRA to implement an education and adaptive management program under its current plan and policies, which GGNRA could choose to do. The No Action alternative for a management plan is not the same as a “do nothing” alternative. GGNRA can choose to implement its existing plan is a more effective way to meet the purpose and need for the proposal.
3. General – when impacts are the same across various alternatives for a particular site, the Draft Plan/DEIS should be revised so that the Conclusion Tables contain identical statements.
4. General – the Conclusion Tables should be grouped together for each site. This would make comparing the various alternatives for each site easier and make the tables more useful.
5. Page 459, last paragraph, states “Impact at the most would be negligible; therefore, impacts to seeps and springs from dogs are not discussed further.” If impacts to seeps/springs are not

discussed further because the impacts are negligible, then why are there so many discussions in subsequent pages about negligible impacts involving other types of water resources? The Draft Plan/DEIS should be made more consistent by not discussing any negligible impacts in subsequent pages of the water quality section.

6. Page 460, Assessment Methodology – the Draft Plan/DEIS should make an assumption under Assessment Methodology that the public would comply with park/dog regulations and requirements, then remove all of the “assuming compliance” (and similar) statements in the subsequent pages of the water quality section. Also, the Draft Plan/DEIS should provide examples of park/dog regulations and requirements, such as being on leash or properly disposing of dog waste.
7. Page 460, Assessment Methodology – the Draft Plan/DEIS should describe how impacts are analyzed qualitatively.
8. Page 468, Paragraph 1 – is it possible for the increased use at adjacent parks to be concentrated at one adjacent park? Would “impacts on water quality in adjacent lands” still not be “expected to be higher than current conditions” if increased use was concentrated in a particular adjacent park? This comment should be addressed in all instances in the water quality section where this could occur.

Other Minor Corrections

9. Page 461, last two paragraphs – the paragraphs beginning with “Dogs were determined...” and “A sub study...” seem more like paragraphs that belong in the affected environment section.
10. Page 462, Paragraph 3 – delete “a” from “...from a many different sources.”
11. Page 462, Paragraph 6 – the Draft Plan/DEIS should provide citation(s) for information in the paragraph beginning with “Potentially adverse impacts...”
12. Page 465, Paragraph 5 – the Draft Plan/DEIS should provide citation(s) for information in paragraph beginning with “Oil spills have...” This comment applies to all instances in the water quality section where this information appears.
13. Page 468-470, preferred alternative discussion – this discussion seems unnecessary as it just repeats previously provided information. This comment applies to all instances in this water quality section where the preferred alternative discussion just repeats previously provided information.

Appendix F

Additional Comments Related to Draft Plan/DEIS Analysis of Biological Resources

Chapter 3: Affected Environment

General:

1. As stated in Chapter 1, use of GGNRA lands by humans and dogs occurred well before the GGNRA was established in 1972. This historical activity should have been considered as part of the Affected Environment. Many sections lack a description or quantification of baseline conditions of biological resources from long term use by people and dogs, or current impacts are assumed but no data or rationale are given (specific comments follow below). Without this baseline information, the impact conclusions in Chapter 4 and the basis for selection of the preferred alternative are not supported.
2. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but without specific data as to where/if they are actually present, this claim is unsupported.
3. There are inconsistencies among the text and Table 8 in the special-status species affected environment, the information in Appendix H, and the impact analyses in Chapter 4. Examples include:
 - Presidio's manzanita. Table 8 states that it is documented within the GGNRA and the impact analysis states that it is found at Baker Beach, however Baker Beach is not identified in Appendix H as having potential habitat for this species.
 - San Francisco lessingia. This species is listed in Appendix H as having potential habitat within a number of San Mateo sites. Fort Funston and Baker Beach are not listed under San Francisco sites as having potential habitat; however, these two sites are the only two considered in the impact analysis of this species in Chapter 4.
 - Hickman's potentilla. There has been no documentation of this species within GGNRA. The table lists this species as having potential habitat at 5 sites within San Mateo County; however, the impact analysis in Chapter 4 is only for Mori Point and Pedro Point. What is the justification that these two were the only ones considered if habitat exists at many sites?
 - California seablite. Appendix H identifies this species as having potential habitat at Crissy Field and Land's End (which is missing from the table Key) and that this species has been documented within the GGNRA. The impact analysis in Chapter 4, only talks about Crissy Field and that reintroduction of the species has failed twice, so species is not currently present within the GGNRA.
4. Table 8, Affected Environment: GGNRA Location column contains the location for plants that do not exist there according to the text:
 - Lessingia – does not occur at Fort Funston

- California seablite – does not occur at Crissy Field
- Hickman's potentilla – does not occur at Mori Point or Pedro Point

Also, the GGNRA location column in Table 8 does not indicate whether the species have been documented at these sites or just that potential habitat is present.

5. For wildlife species that are assumed to be impacted by dogs, the Draft Plan/DEIS fails to establish the level of impact the species are already experiencing, apart from other factors that may be causing disturbances or population decline (within and outside of the GGNRA). This would include issues such as loss of breeding and foraging habitat, predation, climate change, etc. The Draft Plan/DEIS does not indicate how or why a special-status species that has been sharing habitat with dogs for decades will experience a quantifiable benefit from stricter dog management, given other factors affecting the species. For this reason, there is no support for the selected alternatives in terms of actual, foreseeable benefits to wildlife populations. Without this type of information, most impact conclusions in Chapter 4 are not supported. The western snowy plover section of Chapter 3 is a good example.
 - a. *Additional comments on western snowy plover text from Chapter 3:* The Draft Plan/DEIS does not adequately describe how dogs chasing the birds can impact the survival of the species. Birds may take flight readily and expend energy, experiencing some short-term disturbance, but there is no evidence of the GGNRA western snowy plover populations being directly impacted by dog activity in the long-term. The data provided in the Draft Plan/DEIS suggests a stable plover population; therefore, the selected alternatives would not be expected to differ from the No Action Alternative (see paragraph 1, page 799).
 - Monitoring surveys from 1994-2006 observed 48 off-leash dogs chasing western snowy plovers, which is a relatively low number of events over a 12-year period. As stated above, this information suggests snowy plover populations will not experience significant beneficial impacts from the preferred alternatives, and that the No Action Alternative does not significantly impair natural values.
 - The numbers of snowy plovers fluctuated between 1994-2006 “based on a variety of factors”, but the presence of dogs on the beach has not prevented the birds from using their preferred resting areas at Crissy Field or their off-site nesting sites; therefore, there are no documented impacts to the population from a “chasing” incident.

The above analysis is not presented to suggest that a wildlife protection area at Crissy Field would be inappropriate to protect resting habitat from people as well as dogs. It is also not presented to suggest that only areas used by endangered species are worthy of protection. It is well documented in public material that Crissy Field Dog Group, Eco-Dog, and other groups have been and are active in educational efforts with the public, conservation organizations and GGNRA to respect snowy plover protected areas. For example, in 2006, the Crissy Field Dog Group participated in the Western Plover Community Outreach Program with the GGNRA and the Golden Gate Audubon Society in developing a brochure and other educational materials to make the public aware and protect the plovers' habitat at Crissy Field and Ocean Beach. To this day, the Crissy Field Dog Group continues to inform their members and the public about protecting the snowy plover.

The comment is directed toward an example of scientifically unsupported assertions that the Draft Plan/DEIS as a justification for management actions. These become particularly critical

when they are used as the basis for large closures of beaches and other areas where access has been allowed for the past 20-40 years without documented impairment of species.

- b. *Additional comments on mission blue butterfly text from Chapter 3:* the text is not consistent with Table 8 – text states that the species is found in Alta Trail and Tennessee Valley, but these are not listed in the table.
 - There is no clear nexus between dogs and the mission blue butterfly habitat and host plant, and there is no evidence given of damage to the host plant from dogs. Because the area is fenced “but does not physically exclude dogs”, the current and historic use of the area by does not appear to be detrimental to the mission blue butterfly or its habitat/host plant, therefore selection of the No Action Alternative is supported.
 - Mission blue butterfly habitat is “very near” closed social trails that are still used by visitors and dogs; however, there are no data to suggest alteration of the habitat. Because these trails are closed and their use by dogs is not quantified, the species’ habitat does not appear to be impacted by dog use, and the No Action Alternative does not significantly impair natural values.
- c. *Additional comments on tidewater goby, Coho salmon, steelhead trout, California red-legged frog from Chapter 3:* For each species it is indicated that the habitat areas are essentially closed to dogs, but that “these closures are not always followed”. Presumably the use of these areas is rare. Because dog use of the habitat areas is not quantified, there does not appear to be a nexus between dog use and these wildlife habitat areas, therefore the No Action Alternative does not significantly impair natural values.
- d. *Additional comments on bank swallow from Chapter 3:* The nesting colony is well monitored and closed to visitor access, and the nature of reported disturbances is unclear (“Fort Funston has moderate to high visitor use, and in 2007-2008 there were two pet citations, warnings, and reports taken related to wildlife disturbance at the site.”). This small number of incidents over a two-year period does not appear to have affected bank swallow populations; therefore, the No Action Alternative does not significantly impair natural values, and no benefits from the draft preferred alternative are anticipated.

Vegetation and Wildlife, pages 228-244:

1. Pages 229-230, Paragraphs 4/5 and Table 6. The number of warnings/citations/reports does not mean there on any potential impacts to wildlife. The raw data provided in the table raise many questions: What type of interaction between a dog and wildlife constitutes “disturbing wildlife”? How do incidents reported in closed areas necessarily “affect” vegetation and wildlife? Is the nature of the disturbance reflected in the difference between a warning, citation, and report filing? For example, 3 citations and 6 reports of dog disturbance in a park do not suggest any major adverse effect on wildlife populations, habitats, or individuals.

Considering the raw data here and in Appendix G, there appear to be very few incidents of dogs disturbing wildlife over a two-year period, even assuming not all incidents are reported. Furthermore, the Draft Plan/DEIS suggests that a lack of law enforcement contributes to the number of incidents of dogs disturbing wildlife (and therefore has impacts to wildlife). A wildlife disturbance incident is not “high quality information” (as required by NEPA) and cannot be assumed to impair natural values when the actual effects of the disturbance are unknown. It is not likely the species experienced any long-term impacts from these few incidents over a two-year period, nor is there any specific evidence to suggest even short-term impacts. There is also no evidence that the

absence of law enforcement increases the likelihood of wildlife disturbance or harm.

The presence of humans and predators also typically “disturb” wildlife, as this term is used in the Draft Plan/DEIS. For example, shorebirds typically take flight when a human or a hawk or eagle is in their vicinity. This section of the Draft Plan/DEIS does not distinguish or evaluate relevant factors and impacts, but simply asserts that disturbance by dogs is causing unacceptable impairment of GGNRA’s natural values. This assertion is then used as a basis for closing areas to access by dogs, which, given the lack of a thorough impact analysis, might or might not be an appropriate management measure. If people are disturbing the species, and this disturbance is resulting in an unacceptable impact that is impairing natural values, these impacts need to be fully disclosed to understand the consequences of the alternatives.

2. Pages 233-234. Part of the rationale for prohibiting dogs from beach areas under Alternative D is to “protect shorebirds and stranded marine mammals”, but there is no information given here to support that dogs are currently impacting shorebirds and marine mammals; therefore, the No Action Alternative does not significantly impair natural values. Chapter 1 “Dogs and Wildlife” does not report any interactions between marine mammals and dogs.

Special-Status Species, pages 244-256:

1. General. Descriptions of critical habitat are missing for some special-status species that have critical habitat in the GGNRA and inconsistent in the level of detail provided regarding critical habitat among all species descriptions. For this reason, there is no clear nexus between dogs and critical habitat, and the preferred alternatives are not supported.
2. General. Some species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), but other species descriptions do not (San Francisco garter snake, Coho salmon). Where there is likely to be none, it is not stated. Where there is no nexus, the draft preferred alternative is not supported in terms of direct benefits to these species. Even where a nexus is suggested, there is no evidence of impact to these populations; therefore, the draft preferred alternative does not appear to provide a quantifiable benefit to the species and the No Action Alternative does not significantly impair natural values.
3. Page 245, Paragraph 3. States that “marine mammals are not expected to be affected by dogs”, but that stranded marine mammals “may provide an opportunity for contact” with dogs. Given the relatively low number of marine mammal strandings within GGNRA over nine years (as shown in Table 7), it is not rational to assume a nexus between stranded marine mammals and dogs. There is no evidence of a harmful interaction between a stranded marine mammal and a dog. In fact, dog owners are often the first to notify authorities when marine mammals become stranded.

Chapter 4 – Environmental Consequences

General:

1. On page 30, in Chapter 1, under “Safety of Off-Leash Dogs”, studies are cited where data indicated off-leash dogs do not travel far from their owners or trail, and if they did it was a short time and the dogs were rarely seen chasing other dogs, disturbing wildlife and vegetation, or entering bodies of water. In addition, a survey was cited where both dog owners and non-dog owners believed that humans are more disruptive than dogs. This contradicts many of the impact conclusions made for

vegetation, wildlife, and special-status species. The conclusions drawn in the impact analysis are not adequately supported by documented evidence of damage to resources (that can be attributed to dogs) in the GGNRA.

2. General habitat types and which sites they occur in are described in the affected environment section; however, the document lacks a map of the specific location of each habitat types within each site relative to existing and proposed dog use areas and trails. The impact assessments in Chapter 4 are divided up by habitat type, yet all of the actual impact assessments identify impacts on "vegetation" with no indication of whether or not a particular habitat type occurs within the area of discussion (LODs and ROLAs). Without documentation of the specific location of vegetation types relative to dog use areas, conclusions of impacts on these resources are not adequately supported. For example in the wetlands section the Draft Plan/DEIS describes impacts to vegetation along trails within six feet on either side; however, there is no evidence to support the claim that wetlands actually exist adjacent to the trails. In those instances, the wetlands impact analysis is inaccurate.
3. The analysis of the impacts to vegetation lacks empirical evidence of the current impacts caused by dogs. Information is given as to usage and the number of violations but does not site specifics about damage caused by dogs as a result of these violations. Without evidence of the occurrence of impacts caused dogs, impact conclusions made are not adequately supported.
4. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is previously undisturbed. These claims are false as dogs are currently allowed in those areas and dog use would continue under Alternative A, the No Action Alternative.
5. The impacts addressed in Alternatives B-E are assessed based on the assumption of compliance. Alternative A is not assessed this way. For example, if dogs are required to be on leash under Alternative A, the impacts are assessed based on impacts caused by dogs which are off-leash and noncompliant. Alternatives B-E then assesses impacts based on the assumption of compliance and therefore the impacts are reduced even though the leash-law regulation is the same under all alternatives. Assessing impacts based on identical regulations with different assumptions is inaccurate. There is no information given as to why compliance under Alternatives B-E cannot be done under Alternative A. The current GGNRA management plan identifies public education of GGNRA resources as important and could be accomplished under Alternative A.

Introduction (pages 289-290):

1. The compliance-based management strategy assumes that noncompliance is causing negative impacts on GGNRA resources. As commented in Chapter 3, this assumption is not supported by adequate data from GGNRA sites. This strategy (page 290, paragraph 2) "is designed to return impacts to a level that assumes compliance" and "provide beneficial impacts where dog walking is reduced or eliminated". There has been no baseline given to quantify a "level that assumes compliance"; therefore, any potential impacts from dogs cannot be measured or used as a basis for selecting alternatives.
2. The Draft Plan/DEIS states that dogs and humans have been active in these lands for at least the past 40 years (pre-1970s), and that visitation has been consistent over the past 20 years, and will likely remain consistent in the next 20 years. Page 290, paragraph 5, also notes that visitation is not expected to increase over the next 20 years, and that this is "similar how it has been operating over the previous 20 years. Therefore increased visitation should not result in cumulative impacts to GGNRA resources." The basis for assuming that resources have been negatively impacted over the

past 20 years and will therefore benefit over the next 20 years with substantially less access for people with dogs has not been established.

Vegetation:

1. Page 545, Paragraph 2 – the EIS includes no discussion of what “additional actions” would potentially have adverse impacts on vegetation and what types of impacts. Text also states that “mitigation for these projects would reduce the potential for impacts.” However, there is no discussion as to what kind of mitigation would occur and how it would reduce impacts. Therefore, no measure of a quantifiable reduction of impacts can be determined by mitigation efforts. For projects outside of GGNRA, it is assumed that mitigation would be applied. There is no evidence to support this assumption. More specific information is needed to adequately assess and comment on impacts. This comment applies to this same text where it is repeated in the cumulative impact analysis throughout the section and the wildlife and special-status species sections.
2. Page 546, Alternatives B & C – dog walking restrictions are the same as in Alternative A. There are no data that supports a change in the level of impact as a result of these alternatives.
3. Page 584, Alternative B – states that the rocky intertidal plant communities have not been previously disturbed. This is inconsistent with Alternative, A which states that dogs could access the rocky intertidal areas. The inconsistency of the baseline level of disturbance prevents an accurate conclusion as to the potential for impacts caused by dogs.
4. Page 597, Cumulative Impacts, paragraph 3 – this paragraph does not make sense. The text states that adverse impacts from dogs combined with beneficial actions balance out resulting in negligible impacts. Cumulative impacts should be revised to indicate they would not be long term, major and adverse.
5. Page 605, Alternative A, paragraph 1, states that dogs can affect the rocky intertidal vegetation. No evidence has been provided to support that dogs are presently having adverse impacts on this vegetation.
6. Pages 607-08 and 666-667, Alternatives B & C – these alternatives mention the Polywog Path and ponds. There is no discussion of the significance of this path or the ponds or the potential impacts of these areas under Alternative A so the impact conclusions relative to the baseline are not clearly presented.
7. Page 619, Alternative A, states that physical damage and nutrient addition from dogs is assumed to be currently happening; however, there are no data presented that supports this claim. Other impacts described seem overstated considering low visitor use. Because current conditions have not been adequately established, there are no quantifiable changes expected from the Preferred Alternative over the No Action Alternative.
8. Page 632, Paragraph 2, states that dogs would impact coastal scrub, chaparral and grassland vegetation. There is no evidence provided to support the occurrence of this under existing conditions and therefore, no quantifiable benefit expected from the preferred alternative over the No Action Alternative.
9. Page 634, Alternative C, paragraph 1 – There is no evidence that dogs confined to a ROLA increase impacts to adjacent habitat. Without establishing the current level of impacts from dogs in ROLAs, no quantifiable change can be expected from the preferred alternative over the No Action Alternative.
10. Page 645, Alternative A, paragraph 1 – “...viable plant communities exist.” Data are lacking as to the type of plant communities that exist in the areas adjacent to the trails and fire roads in order to clearly describe suggested impacts.

11. Page 658, Alternative A, paragraph 1, states that several threatened and endangered plants grow in serpentine soils. There are no data to support the presence of these species at this site. This information is needed to clearly describe suggested impacts.
12. Page 698, Wetlands and Aquatic Habitats, General Comment – many of the impacts to wetlands are based on six-foot corridors adjacent to trails. There is no mention of where exactly wetlands are located within each site and whether or not they occur within six feet of the trails. Each impact just says “vegetation adjacent to trails” which is not specific to wetlands or aquatic communities in which this section is solely addressing. Without evidence of the exact locations of wetlands and aquatic habitats within each site, no assessments can be made as to the level of impacts of the preferred alternative over the No Action Alternative.
13. Page 740, Native Hardwood Forests, General Comment – impacts to this habitat by dogs would vary by maturity of the trees. All impacts seem to just state “vegetation” which does not clearly describe suggested impacts.
14. Page 740, Alternative A – Data are needed as to the maturity of the trees in order to assess the level of impacts caused by dogs under all alternatives. Dogs would not be able to trample mature trees.
15. Pages 769-774, Alternatives B-E, states that riparian vegetation along trails would be impacted. There is no evidence to indicate that riparian vegetation occurs along trails and therefore, no quantifiable changes in impacts can be expected from the preferred alternative over the No Action Alternative.

Wildlife (pages 791-1108):

1. General. It is assumed throughout the analysis that marine mammals and shorebirds would suffer negative impacts from off-leash dogs and that birds would suffer negative impacts from on-leash dogs. There is no evidence to support this assumption. As noted in comments above, a disturbance is not the same as an impact. NEPA defines “effect” or “impact” as requiring a likely causal consequence (40 CFR §1508.8). Under NPS and GGNRA policy, as explained in the Draft Plan/DEIS (page 35), the impact would likely need to impair the natural values afforded protection under applicable plans or policies. Under NEPA, the significance of that impact needs to take into account context and intensity (50 CFR §1508.27). Because current conditions have not been adequately established, there are no quantifiable changes expected from the preferred alternative over the No Action Alternative.
2. General. For preferred alternatives in coastal areas that allow dogs on leashes, it is stated that on-leash dogs could still disturb shorebirds by barking or presence; however, the impacts are determined to be negligible. In other sections, it is suggested that barking and presence of off-leash dogs would result in minor to adverse moderate impacts. Again, because the potential level of disturbance has not been clearly established, there is no basis for assuming the presence of dogs will have significant adverse consequences relative to other factors (such as people or predators) or to quantify changes expected from the preferred alternative over the No Action Alternative.
3. General. In some areas, the difference between the No Action Alternative and preferred alternative is off-leash and on-leash use. Long-term minor to moderate impacts are expected for off-leash dogs, and long-term minor impacts are expected from on-leash dogs, although the difference in disturbance to wildlife between on- and off-leash dogs under voice control has not been established. Physical damage to nests and habitat and wildlife chasing is cited as a moderate adverse impact; however, the level of current damage is not known. The data presented in Appendix G further indicate limited interactions over time. This is noted for:

- Homestead Valley, Alta Trail, Oakwood Valley, Marin Headlands, Fort Baker, Baker Beach and Bluffs, Lands End, Mori Point, Milagra Ridge, Pedro Point coastal scrub, chaparral, and grassland habitats.
 - Fort Baker forest habitat
 - Marin Headlands outside of LOD area, riparian habitat
 - Fort Miley, other coniferous community
4. Throughout the analysis, Alternative A (No Action) assumes noncompliance, while the other alternatives assume full compliance with dog restrictions (which leads to a “long-term minor adverse impacts” conclusion for Alternative A and a “negligible” conclusion for the preferred alternative). In some cases, the only difference between Alternative A and the preferred alternative is the assumption of compliance. When proposed dog management is the same for a given area under two or more alternatives, the impacts should also be the same. Many of the differences in impacts are based on assumed compliance under the action alternatives; however, as noted above, an unbiased comparison would assume compliance for all alternatives. This is noted for:
- Stinson Beach (coastal)
 - Crissy Field (outside of ROLA – coastal and wetland)
 - Baker Beach and Bluffs (outside of ROLA - coastal)
 - Mori Point (coastal and wetland)
 - Oakwood Valley (outside of ROLA - forest)
 - Muir Beach (riparian)
5. Page 794, Duration of Impact (same comment for page 1112 of Special-Status Species) –The assumption that “all natural resources” will experience short-term impacts during the education and enforcement period, regardless of the alternative chosen, is not supported. It may be accurate to state that the existing conditions will continue during the education and enforcement period of an adaptive management plan. The section goes on to note it is “expected that compliance...and associated adverse impacts would improve gradually and impacts on wildlife would then become long-term.” This expectation is not supported by the information provided in Chapter 3. There are little data or descriptions of current adverse impacts; therefore, there is no baseline provided that would indicate improvement under the preferred alternative. The assumption that impacts will become long-term (described as persisting for the next 20 years) is also not supported, given the lack of adequate, quantifiable baseline conditions.
6. Pages 796-797, Impacts Common to All Alternatives – prey species are adapted to fleeing from predators, whether dogs or any other. Although the Draft Plan/DEIS labels this as harassment (based on a definition in the Endangered Species Act, which does not appear to be the appropriate standard), it would nevertheless not be expected to impact the species. Even if a species avoids near-trail areas because it has adapted to the presence of dogs (a potential predator), it does not mean that species is experiencing an adverse impact. The Draft Plan/DEIS states that “actual direct injury or mortality to wildlife by dogs (on or off leash) is rare,” so any potential long-term, adverse impact from this “harassment” is not expected. The studies currently cited are not supportive of the preferred alternative – it is not unusual for a rodent (marmot) or bird to react to a predator.
7. Page 797, Paragraph 3 – a study is cited concluding that “off-leash dogs have no impact on the diversity or abundance of birds and small mammals because these species are fairly tolerant of...human activity,” which indicates the No Action Alternative would not significantly impair natural values.
- The results of the study by Shulzitski and Russell (2004), is cited in support of dog restrictions; however, this study appears to be biased. The restricted area was restored with native vegetation, while the unrestricted area was not restored. Wildlife was more abundant in the restored area, but this may have been due to the re-planted native vegetation – there is no

evidence to suggest that restricting dogs caused an increase in abundance. The observation of a dog barking at a fox (whose behavior remained unchanged) at Fort Funston supports the argument that wildlife in GGNRA are acclimated to dog presence and that the No Action Alternative would not significantly impair natural values.

8. Page 800, Paragraph 2 – “When compliance is assumed, management alternatives that would prohibit dogs from accessing wildlife habitats would eliminate disturbance to wildlife from dogs...” The Draft Plan/DEIS states that GGNRA visitors sometimes access restricted areas, but these occasions are not quantified, nor are the baseline conditions in these areas provided. There is no evidence to suggest wildlife would experience benefits from prohibition associated with the selected alternative. Although compliance should be assumed for all alternatives, there will likely be some non-compliance by various visitors, with or without dogs. Because perfect compliance cannot be assumed, and because the current conditions are not known, it cannot be concluded that the alternatives would provide a benefit to wildlife over the No Action Alternative.
 - “Prohibiting dogs from areas also prevents habitat degradation and loss of species that are sensitive to the presence of dogs” – this has not been supported in the text. Loss of species from dogs in the GGNRA has not been presented. While the Draft Plan/DEIS presents a few studies that suggest certain species are “sensitive” to dog presence, it presents other studies that found little or no sensitivity to dog presence; therefore, the preferred alternative is not supported.
9. Page 802, Compliance-Based Management Strategy
 - Because some noncompliance is already occurring, it is unclear why supposed impacts would increase and potentially become “major adverse” if noncompliance continues, especially given the relatively stable visitor level in recent and projected years. Again, the baseline conditions, including 40 years of use by people with their dogs, have not been established and any impacts stemming from noncompliance have not been outlined; therefore, there is not adequate support to conclude major adverse impacts.
 - There is no description of how or if newly restricted areas would be monitored for a change in natural resources. Because the baseline conditions have not been established, changes in management based on noncompliance should be approached with care.
10. Page 809, Alternative A – it is unclear how shorebirds, gulls, terns, and marine mammals would experience moderate adverse impacts from dogs, or how “occasional to frequent disturbances would occur”, given the documented low shorebird abundance, and no historic incidence of dogs affecting marine mammals at Muir Beach. See prior comment on marine mammals (page 245).
11. Page 812, Alternative D – it is unclear how species will benefit from total exclusion, because it hasn’t been established that species are currently being negatively impacted on Muir Beach. There would likely be “no change”.
12. Pages 825-826, Alternative A – the rationale for the “long-term minor adverse impacts” conclusion does not mention mission blue butterfly habitat; however, for the preferred alternative, beneficial impacts are assumed because dogs would no longer be allowed on Battery Yates Trail (near mission blue butterfly habitat).
13. Pages 856-857, Alternative A – the snowy plover resting areas have been monitored since 1996 with no evidence to suggest that preferred habitat use has changed (the snowy plover section of Chapter 3 states that birds continue to use the same two resting areas), or that roosting and foraging behavior is being adversely affected by dogs, yet this is given as rationale for long-term moderate to major adverse impacts.
14. Page 971, Alternative A, states that on-leash dog walking is currently allowed at Sweeney Ridge. There is no baseline condition given to quantify any supposed impacts currently occurring at Sweeney Ridge that would lead to a “no impact, beneficial change” under the preferred alternative (prohibiting dogs from Sweeney Ridge).

15. Pages 995-1001, Muir Beach Lagoon – this analysis seems to apply only to the lagoon area for Alternative A, which is already restricted. Noncompliance is assumed and minor to moderate adverse impacts are cited for Alternative A. The preferred alternative (deemed negligible impact) prohibits dogs “from the Muir Beach site”(is this also referring to the lagoon area only?) and the only difference between these two alternatives is the assumption of compliance. See first bullet under Comment 11 regarding noncompliance; the preferred alternative is not supported simply by assuming compliance.

Special-Status Species (pages 1109-1291):

1. General. Suitable habitat for the plant species discussed in this section occurs at other sites which were not analyzed in this section. The Draft Plan/DEIS lacks a discussion as to specifically why certain sites were chosen over others for analysis.
2. General. The microhabitats of the special-status plant species are very specific. The Draft Plan/DEIS lacks information delineating the location of the potential habitat within each site. This is necessary to establish a baseline for the current level of impacts by dogs in these areas and accurately assess the potential impacts based on the alternatives. This information is essential and capable of being obtained.
3. Page 1112, Assessment Methodology – analysis of vegetation changes does not account for aquatic critical habitat loss. Was loss of critical habitat for aquatic species measured?
4. Pages 1117-1123, San Bruno elfin butterfly – here, Alternative A and the preferred alternative do not differ (on-leash, negligible impact). The impact of Alternative A appears to assume compliance with leash law, and it is stated that “historical use of this area shows no indication that the host plant or butterfly is being affected by dogs;” therefore, the No Action Alternative would not significantly impair natural values.
5. Page 1124, paragraph 2, mission blue butterfly, cites localized, perceptible damage to habitat on trail beds, roads, and adjacent areas “as a result of damage to the vegetation from dogs”, but there is no description of how this was assessed. These areas are used by hikers, runners, naturalists, bikers – how is damage from dogs isolated from these other potential sources? The preferred alternative expects negligible/beneficial impacts by eliminating use of social trails by dogs, but it does not appear that continued human use was considered in this conclusion (same comment applies to conclusions for other analyzed mission blue butterfly areas: Oakwood Valley, Marin Headlands). As stated previously, baseline conditions on these trails have not been adequately established; therefore the negligible/beneficial impacts cited under the preferred alternative are not supported.
6. Pages 1147-1158, mission blue butterfly, Fort Baker and Milagra Ridge – as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) and the preferred alternative assumes compliance (negligible to minor, adverse impacts, with habitat restoration programs). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.
7. Pages 1165-1172, tidewater goby – Alternative A states that Rodeo Lake is currently closed to dogs, and the lagoon is closed to dogs and humans. The proposed fence “will deter but not physically exclude dogs”. It is explained that dogs in voice-controlled areas are not very well controlled and have been observed in the lagoon. Impacts range from negligible to long-term, moderate adverse. Under the preferred alternative, Rodeo Lagoon would remain closed and dogs are still able to access the area; compliance with leash restrictions and ROLAs is assumed. The impacts under the preferred alternative are expected to be negligible – again, this conclusion seems merely based on an

assumption of compliance, when the level of use and potential for noncompliance is the same as under the No Action Alternative. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

8. Pages 1172-1191, Coho salmon and steelhead trout – as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible impacts). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.
9. Pages 1191-1219, California red-legged frog, Muir Beach, Marin Headlands, Mori Point, Cattle Hill, Pedro Point – as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.
10. Pages 1219-1240, San Francisco garter snake, Mori Point, Milagra Ridge, Cattle Hill, Pedro Point – as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). The text states (page 1230) that there is no documentation that the current level of compliance with on-leash laws (No Action Alternative) is impacting this species. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.
11. Page 1240, western snowy plover – states that walkers who traverse the beach area currently impact plovers. As described in Comment 6, it is difficult to distinguish between dog and human activity. The basis of the impacts conclusion is based on the assumption that dogs currently impact snowy plovers at Crissy Field, but there is no evidence to support that removing dogs from the area will result in a change in the plover population. The preferred alternative assumes compliance and negligible impacts by closing the site to dogs. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance. There are data provided of observations of dogs chasing birds, but no correlation between these events and impacts to the species (see prior comments on Chapter 3). These observations have been made since 1996, but the plovers' use of preferred habitat does not appear to be limited. There is no obvious nexus between dog chasing and loss of species or habitat, therefore the "moderate adverse impacts" under the No Action Alternative are not substantiated.
12. Page 1264, bank swallow – as with the Western snowy plover, current impacts are considered minor to moderate based on occasional to frequent perceptible disturbances to the species from dogs; however, the description of Alternative A mentions only that dogs have been seen in the bluff area. There is no apparent nexus between dog activity and actual short-term or long-term impact to bank swallows.
13. Page 1277 – This is contradictory – there is no evidence that the spotted owl exists at the site; however, impacts are deemed adverse under the No Action Alternative. If it is because potential habitat exists, then it seems (page 1282) that no change would occur under the preferred alternative, in which dogs remain leashed. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.
14. Page 1291 – according to the table in Appendix H, suitable habitat for the listed plant species exists at many sites. There is no discussion of what rationale was used to determine which sites were considered in this analysis.
15. Page 1292, 2nd paragraph – there is no evidence of dogs currently accessing the dune scrub vegetation presented to support the impact conclusion. Without adequately establishing a baseline for current impacts, no quantifiable changes in impacts can be expected from the preferred alternative over the No Action Alternative.

16. Page 1296, Alternative D, states that impacts to lessingia adjacent to the trails in the LOD area would occur in areas that "have not been previously disturbed." However these areas are currently open to dogs, therefore any impacts from dog use would already be occurring. Therefore, the level of impact is misrepresented. Similar statements occur throughout this section including pages 1305, 1316, and 1323.
17. Page 1306, Alternative C, conclusion table, states "if potential San Francisco lessingia habitat is located in the LOD area." Locations of the potential habitat should already be known, and impacts should be based on whether or not potential habitat is actually present. Without data supporting the location of lessingia habitat, no conclusions can be made regarding the potential impacts.
18. Page 1311, Paragraph 1, states that the greatest benefit to the species would occur if the Daly City genotype is reintroduced at Fort Funston. There is no evidence given that the implementation of this is expected. This would be relevant to the proposed management of the area and concern for potential impacts.
19. Page 1312, Alternative A, states that the widening of the Coastal Trail would increase impacts to Presidio manzanita. This is inconsistent with the cumulative impacts on page 1313, which states that the trail realignment would avoid the manzanita and provide long-term protection.
20. Page 1325, Paragraphs 1 and 2 – these two paragraphs are inconsistent with each other. Paragraph 1 state impacts to Marin dwarf-flax adjacent to the trails would be long term, minor and adverse. In paragraph 2, it states that the plant exists in soil outcrops that are inaccessible and that physically restraining dogs would protect the habitat and restored population.
21. Page 1329-1332, Alternatives B-E – dogs are prohibited from Crissy Marsh under the No Action Alternative as well. dogs are prohibited from the marsh under all alternatives, impacts should be the same. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.
22. Page 1333, Hickman's Pontentilla – No justification is given as to why only Mori Point and Pedro Point were the only two sites analyzed if no mapped occurrences have been recorded there and potential habitat exists at other sites as well (per the affected environment and Appendix H).
23. Page 1336-37, Alternative C, conclusion table – the rationale for impacts in the LOD area should be the same as the other Alternative B impacts, based on the text discussion.
24. Page 1342, Alternative C, conclusion table – the rationale for impacts in the LOD area should be the same as the other Alternative B impacts, based on the text discussion.

Appendix G

Crissy Field Dog Group (CFDG) Testimony

presented by

Kenneth S. Weiner
K&L Gates LLP

before the

**San Francisco Board of Supervisors
Land Use and Economic Development Committee**

April 11, 2011 1-5:30 pm

San Francisco City Hall, 1 Dr. Carlton B. Goodlett Place
Committee Room 263

My name is Ken Weiner, and we represent Crissy Field Dog Group. CFDG is a non-profit organization dedicated to promoting responsible dog ownership and off-leash dog walking in the Golden Gate National Recreation Area (GGNRA). CFDG participates with the SF SPCA and other community and recreational groups in Eco-Dog, a coalition of groups that advocate for responsible dog guardianship and environmental stewardship of our natural resources. Many of our members are also members of conservation organizations Michael Lynes just mentioned.

Our focus -- and the focus of remarks -- is to de-polarize issues -- and find ways to support GGNRA's mission to preserve natural *and* recreational values, and scenic and cultural values, unimpaired, for current and future generations.

First, I want to acknowledge the effort GGNRA has put into this and the excellent introduction by GGNRA Superintendent Dean at this hearing.. These are difficult public lands management issues.

We think GGNRA's and the City's charters can help guide us.

San Francisco's charter starts with the following goal of home rule: **"to improve the quality of urban life."**

GGNRA was born from the simple, logical premise that open space is vital to the San Francisco metropolitan area -- that it an **essential ingredient to the quality and design of our urban environment.**

GGNRA was established by Congress in 1972 to meet the recognized need for urban recreation and open space as the San Francisco metropolitan area was growing and becoming increasingly developed.

The Park Service will tell you that it has to manage all units of the National Park System consistently with its Organic Act to protect natural resources from impairment. This is accurate – and it is *also* accurate that it has to manage each unit consistently with the Congressional charter for that unit – in this case the GGNRA.

President Nixon's Message to Congress in February 1972 proposing the creation of GGNRA stated: "This proposal would encompass a number of existing parks, military reservations, and private lands to provide a **full range of recreational experiences.**"

When people recount legislative history, as they have here, it is instructive to look at the original source documents. It turns out, when I was on the White House staff preparing the President's 1977 Environmental Message and Program, I came upon a copy in [the President's Chief Domestic Policy Advisor] John Ehrlichman's files of the original 1972 Environmental Message which transmitted the proposed legislation to establish GGNRA to Congress. Here is my dog-eared copy, nearly 40 years old.

I point this out because some have told you that the local park areas are sufficient and that the purpose of GGNRA was primarily natural area preservation, and not to increase the amount of recreational area.

In the February 8, 1972 transmittal of the proposed legislation to Congress, the Secretary of the Interior explained that, while the **state and local governments have all provided some open space**, "the potential for park and recreation development of a **much greater acreage** should be realized in order to meet the **demonstrated need for recreation space**" and a "variety of outdoor recreation uses."

The original intent of GGNRA identified the needs that would be met, noting, for example:

"On the south side of the Golden Gate is **heavily used urban parkland**, including Ft. Mason, Gashouse Cove, Crissy Field, and Marine Green."

Congress' intent is stated in the bill reports for the 1972 legislation – that GGNRA:

"will ensure its continuity as open space for the **use and enjoyment** of present and future generations of **city-dwellers**" [House Report No. 92-1391, Sept. 12, 1972].

Dog walking was well-known and recognized by Congress as part of this use and enjoyment. In describing part of the area in the city, both the Senate and House reports comment that the proposed area:

"will satisfy the interests of those who choose to fly kites, sunbathe, walk their dogs, or just idly watch the action along the bay."

The official legislative history notes:

"This legislation will, if enacted, capitalize on the availability of this important, unequalled resource in the San Francisco region by establishing a new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan region. As an urban recreation area, it must relate to the desires and interests of the people, but it must, at the same time, be managed in a manner which will protect it for future generations."

These were also the City's understandings in transferring lands to GGNRA. As you may know, GGNRA has a mission statement which states:

"The mission of the Golden Gate National Recreation Area is the preservation, unimpaired, of the natural and cultural resources, and scenic and recreation values, of the park for present and future generations to enjoy."

This is all we ask.

* * *

I would like to say a few words about alternatives in the draft Plan.

We should share with you our conclusion that the draft EIS doesn't provide a solid technical basis for dismissing the No Action alternative, when many areas under the current policy are working.

You may know the plan is being developed in the context of a larger update to the GGNRA management plan. **This is not just about dogs.** If the current preferred alternative is adopted based on the type of analysis in the draft EIS, it will reflect a larger direction to curtail recreational uses in GGNRA.

An EIS is required to analyze the human environment. The federal NEPA rules define the human environment and its scope in an EIS as follows:

“Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment.”

Unlike the environmental impact reports typically prepared under NEPA and CEQA – with which the City is well aware – this Draft EIS has no detailed analysis of adverse impacts to recreation in the affected area, or of related mitigation measures.

Thinking of this definition – and of GGNRA’s legislative history, charter and mission, and of your own San Francisco charter – one of the most remarkable statements in the draft EIS is that: *“the quality of urban areas is not a significant factor in determining a dog management plan”* [DEIS, page 22]

The Land Use Committee knows better than most that good environmental design can solve many controversies that seem intractable – including how open space, parks and trails are designed. But this is dismissed as not relevant to the plan.

We don’t disagree with the objective of having clearer rules and signs, better compliance, and fewer conflicts. But the severe restrictions in the preferred alternative go too far. While they are not a ban, they are not yet balanced.

In short, GGNRA has more work to do to examine reasonable alternatives – and we hope you will encourage them to do just that.

We do want to recognize the outreach by GGNRA on recent series of public meetings on its proposed plan and EIS. This took a lot of organization and staff time.

Regardless of whether people liked the format of the meetings, there were a lot of thoughtful comments and suggestions made. GGNRA staff say they are listening with an open mind – very important and hope it’s true – because draft Plan and draft EIS does *not* reflect consideration of many good comments and reasonable alternatives suggested during the earlier scoping process.

That is disappointing, because NEPA requires all reasonable alternatives to get a ‘hard look’ by the agency. If it doesn’t happen now, it won’t happen – and that won’t be good for the City.

For example, I heard thoughtful, non-ideological comments like these at the recent meetings.

- Citizens asked questions about how the compliance-based approach will work, how and where compliance will be measured, whether there will be an effort to educate and teach people the rules before issuing tickets.
- Neighborhood residents suggested a few places where a separate access path to a beach for people with dogs could easily resolve a long-standing problem area at Fort Funston, and be designed to restore native species and blend into the natural environment. .
- People suggested some areas where they could walk with their dogs just on leash – not even off leash – along a ridge.
- In one of the most visited urban units of GGNRA, Crissy Field, I heard people wondering why a former airfield would become off limits, and suggest better ideas than closing 75% of the current shoreline area without reducing protection for snowy plovers..

* * *

In conclusion, this isn't about environment vs development. It's about meeting two environmental needs: preserving natural areas *and* recreation in an urban area.

The San Francisco Board of Supervisors has not been reluctant in the past to stand up for the needs and rights of its residents to use the GGNRA. Some of you may recall the Board's December 2001 Resolution, when park management changes the rules and did not adequately engage the community its planning.

This time, GGNRA is using the NEPA process to seek the comments of San Francisco and its citizens. We appreciate their efforts – we know it's not easy.

For the quality of the city, the quality of its environment, the quality of its neighborhoods – in short, for the quality of urban life, as it says in the SF charter – we ask you to ask GGNRA to take a 'hard look' at the 'urban environment' and become a partner with you, and us, to improve its proposed plan so that both natural and recreational values are preserved.

Thank you.

Appendix H

Good afternoon Supervisors,

My name is Rebecca Katz and I am the director of San Francisco Animal Care & Control, your City's open door animal shelter.

You will hear a great deal of testimony today about what may be lacking in the National Park Service's Draft Dog Management Environmental Impact Statement. You have and will also hear more about the prospective impacts on City Parks and impact on users of the GGNRA property. I would like to take this opportunity to address ACC's concerns about this plan as it relates to animal welfare more specifically.

ACC is responsible for stray or unwanted domestic animals and finding them new homes, but we also provide rescue and facilitate wildlife rehabilitation for sick, injured and orphaned animals throughout San Francisco. Accordingly, we are an advocate for dogs (and off-leash play) as well as for other animal welfare issues including coexistence with local wildlife.

The National Park Service's Dog Management Plan for the GGNRA notes that the plan is designed to ensure the protection of natural, cultural and recreational resources of that land. The primary supporters of that plan share our concerns about the impact on native wildlife. But,

the issue has come forward to the Board of Supervisors and other elected officials as a matter of choosing the side of dogs or that of natural resources – either/or. SF/ACC does not view this as an either/or situation. We share the advocates’ concerns about wildlife and other environmental impact. However, the EIS document presented by the NPS does not clearly demonstrate that the presence of off-leash dogs is the sole, or even primary, cause of damage to native species. The EIS document lacks foundation or analysis about the cause of any impact. The mere fact of off-leash dogs being present does not lead to an automatic conclusion that those dogs have impacted an area that is also frequented by people without dogs or with dogs on leash, horses, hang gliders, the Park Service Ranger’s ATVs or other predatory wildlife.

The NPS conclusion that restrictions and a compliance based enforcement that could ultimately lead to an outright ban prohibiting dogs from being allowed on GGNRA property altogether does not contemplate the urban environment in which those lands sit or the interests of the people of San Francisco and the Bay Area. Moreover, the preferred alternative is overly restrictive given that the NPS has not taken intermediate steps to educate the public and users about what is required for coexistence. In fact, most of that has been done by local dog organizations interested in preserving their access to the off-leash areas. It seems that the NPS has not considered various options at their

disposal prior to implementing restrictions. For example, they could implement an adaptive management plan that might include signs, timed use, fencing, enforcement of laws or rules similar to our local pooper scooper law, licensing laws or permitting options.

We have met with GGNRA Superintendant Frank Dean and Director of Communications Howard Levitt from the NPS to discuss our concerns. And of course, we share their concerns about visitor and employee safety, wildlife protection, and maintaining resources for future generations. We would like to work with them on solutions that would allow for more flexibility in coming up with a plan that addresses the needs of San Francisco residents, both human and non-human. Unfortunately, up to this point, they have not seemed receptive to suggestions for compromise within the parameters of the Draft Plan. Peaceful coexistence requires understanding and movement from both sides and is the only way that a City like San Francisco, with such diverse interests, can seek solutions to our challenges.

Without a firm commitment from the NPS to consider the concerns of San Francisco stakeholders, on behalf of San Francisco Animal Care and Control I feel compelled to oppose the Dog Management Plan as presented which dramatically changes the nature of the current and intended use of GGNRA land.

Appendix I

Hi. My name is Andrea Buffa. I live in the Sunnyside neighborhood of San Francisco. I'm a long-time peace and justice activist and also an environmental activist. I've worked on climate change and green jobs and renewable energy for about a decade.

I just want to speak to why we should pass a resolution.

First I think we need to make the GGNRA take our concerns more seriously. It's not like our resolution is going to stop them from moving forward. They're moving forward. But I'm afraid they think we can do our rallies and submit our comments and they can just keep going. But if the city of San Francisco says no this is not okay, they'll take that more seriously.

I think we need to get the city officially involved in the NEPA process by formally submitting a comment.

I think that you passing a resolution will help our federal representatives to get involved. The GGNRA is part of the national park service, which is a federal entity. But if we can go to them and say, look, the city of San Francisco is taking this very seriously, we need you to take this seriously as well.

I also think we should pass a resolution to acknowledge our community and the impact this is going to have on our community, to reject the idea that it's dogs versus the environment and to insist that there's another way, and we're San Francisco and we can figure out what that way is.

I think we need a resolution because we need to tell the GGNRA that you can't just slap together a bunch of data and then make a recommendation that isn't actually supported by the data. That's not okay.

And I think we also need to tell them it's not okay to put forward an environmental impact statement that doesn't provide data on the impact on city parks.

Thank you very much.

Appendix J

Dogs Have No Impact on Bank Swallows at Fort Funston

The GGNRA Draft Dog Management Plan Environmental Impact Statement (DEIS) claims that dogs at Fort Funston “dig at or collapsing burrows, flushing birds from nests, and causing active sloughing and landslides...” (p. 1265) In fact, there is no evidence that dogs have any of these impacts at Fort Funston.

The GGNRA monitors from 2000 through 2006 observed a very few dogs (total of three in 2001-06) in the “closed area” around the bank swallows. That’s all the evidence there is, the presence of a few dogs. Digging, flushing, and landslides are listed in the monitoring report as “potential impacts,” not observed events. From “potential impacts,” DEIS leaps to “continuing impact.” (p.1265) Note that, still, no one has seen a dog collapse a bank swallow burrow, flush a swallow, or cause a landslide in the bank swallow colony at Fort Funston.

It is significant that these impacts have not been observed—people have been out there looking for them. A GGNRA researcher closely monitored the bank swallow colony in 1994 and 1995 and wrote an official report (Chow, 1996). She observed that there were dogs present, and noted they did not disturb the swallows. She also listed a number of things the GGNRA should do to protect the bank swallow colony, but doesn’t mention the dogs. The entire 1993-2006 monitoring project hasn’t documented any dog-caused burrow collapses, swallows flushed from nests by dogs, nor any landslides due to dogs.

We should not be surprised that dogs have no impact on the bank swallows. Bank Swallow, by Barrett Garrison, identified as a bank swallow expert by GGNRA, says, “Bank Swallows appear relatively insensitive to moderate levels of human-induced disturbance.” Garrison lists documented land uses around Bank Swallow colonies: hydroelectric power generation, irrigation, recreational boating, commercial agriculture, vehicular and pedestrian traffic, and livestock grazing. They nest in active quarries and in busy road cuts

The bank swallows nest in burrows in the cliff faces at Fort Funston, and fly directly from the burrows to feed over Lake Merced to the east. Dogs are not even aware the swallows are present. People who do not go looking for the swallows don’t notice them either. The swallows don’t interact with or react to people or dogs.

Speculation of what might happen, which runs counter to years of experience with what actually does happen, is not science. And such groundless speculation should not be used to eliminate recreational dog walking at Fort Funston, nor elsewhere in the GGNRA.

Keith McAllister, April 2011

Appendix K

April 21, 2006

Superintendent, GGNRA
Ft. Mason, Building 201
San Francisco, CA 94123

Dear Superintendent O'Neill,

Thank you for providing Crissy Field Dog Group with an opportunity to comment on the scoping aspect of the GGNRA Dog Management Plan/EIS.

Crissy Field Dog Group (CFDG) is committed in supporting responsible off leash dog walking in the GGNRA. Over the past six years, CFDG has provided thousands of litter bags at Crissy Field, and we sponsor a monthly cleanup at Crissy Field with our volunteers. In addition, we want to continue protecting natural resources in the GGNRA.

Personally, I have enjoyed walking (and dog walking), running and hiking at Crissy Field, the Presidio, and Rodeo Beach for the past thirty years.

General Comments

- 1) How will the park's planning process take into consideration other city, county and regional dog management planning and established regulations?
- 2) How will this planning process be incorporated into the GGNRA GMP update process?
- 3) The EIS should include a monitoring program for the future implementation of any of the alternatives, to monitor the effects of dog management on park resources and the success of the plan's implementation of achieving the stated goals.
- 4) The EIS needs to identify a process for making modifications in the future if through monitoring there is a need to amend the final plan.
- 5) The EIS should identify a process for making modifications and amendments to the plan should there be future park land acquisitions, trail modifications, etc.
- 6) The 1979 Pet Policy was promulgated prior to the park's acquisitions of new lands (including former military lands that are now under NPS management). If the 1979 Pet Policy forms the basis of one alternative, the EIS needs to clearly articulate the criteria used for making dog management recommendations for the newly acquired lands.

- 7) The EIS needs to include Presidio Area B within the project study area.
- 8) The GGNRA is located near a major urban area and therefore, already exist and will be in the future, larger numbers of visitors and types of visitor uses. This needs to be considered in the planning for dog management as well as the upcoming update to the GGNRA GMP.
- 9) NPS needs to use scientific data (just not literature searches) as part of their decision making process in determining where sensitive habitats and/or endangered species are located within the GGNRA. The EIS needs to clearly state what the assumptions are for these habitats. The alternatives should consider options for the use of seasonal restrictions versus year round restrictions, for some areas.
- 10) How will "impairment" of natural resources be determined by the GGNRA?
- 11) The activity of "off-leash dog walking" or dogs under voice control should be considered to be part of dispersed recreation such as walking, wind board sailing, surfing, etc. Don't hold off leash dog walking to a different standard than other recreational activities.
- 12) If there are perceived increase conflicts surrounding off leash dog walking, the NPS should be able to identify and quantify these conflicts.
- 13) Identify all areas within the GGNRA where people currently walk dogs off leash (both legally and illegally). This should be considered the basis for no change and should be one of the alternatives studied in the EIS, even if this activity is not part of the 1979 Pet Policy. Examples include Mori Point, Milagra and Sweeny Ridges in San Mateo and East Ft. Baker in Marin.
- 14) There is no applicability of the City of San Francisco's precautionary principle for off leash dog walking in the GGNRA.

Visitor Use Issues in the GGNRA

- 15) The experience of sharing the park with dogs and enjoying the beautiful natural surroundings.
- 16) Quality of life issue for seniors and families who walk their dogs, get exercise, and are able to socialize with other people.
- 17) Safety is always a concern for every visitor and park employees-in order to achieve the planning goal to "reduce visitor conflict", identify all current user conflicts and factors contributing to these conflicts.
- 18) The EIS should consider the amount of cleanup and habitat care by already provided by existing dog groups such as the Crissy Field Dog Group and the Ft. Funston Dog Group.

Resource Management Issues

- 19) The NPS should study scientific evidence of impacts by off leash dog users as compared to other NPS user groups, including other recreational users. Identify and consider cumulative impacts of these users groups and options

- for reducing impacts, including changes to current land use designations.
- 20) The NPS should study the value of dispersing recreational uses and activities across park areas and resources, including off leash recreation.
 - 21) Provide the scientific data to establish wildlife protection/wildlife sanctuary areas within the GGNRA.
 - 22) Study areas have to be cohesive-no one size fits all. Keep the study areas small so their unique characteristics can be considered.

Safety Issues

- 23) In order to achieve the planning goal to “reduce visitor use conflicts”, identify all current user conflicts and factors contributing to these conflicts in order to understand the significance of reported conflicts in context. In other words, are dogs really the culprit in these user conflicts?
- 24) Study the effect of education on reducing conflict and increasing visitor and park employee safety.
- 25) Investigate actual safety issues-is off leash activity more dangerous than other activities?

Crissy Field

- 26) Crissy Field has become a major “designation” point for visitors from the SF Bay Area, nation-wide and throughout the world. As San Francisco’s “front yard” and with the Golden Gate Bridge as an international landmark, visitation use has far exceeded NPS visitor projections. Crissy Field visitor users include walkers, joggers, off leash dog walkers, wind surfers, birders, skaters, kite boarders, photographers, painters, numerous special events, etc. Perhaps an update to the Crissy Field Environmental Assessment Plan is warranted given the unanticipated HIGH use of Crissy Field, especially on a sunny weekend day.
- 27) The Crissy Field EA identified 70 acres to be allocated specifically for off leash dog walking. In addition, the Haas family, as well as other donors for the Crissy Field restoration, fully expected to have off leash dog walking as part of the recreational experience at Crissy Field.
- 28) A big safety concern at Crissy Field includes bike riders speeding on the promenade (especially on a sunny weekend day), jeopardizing people walking; numerous kite boarders sometimes lose control of their kites and could potentially hit people walking on east or central beaches.
- 29) The EIS should consider the impact of thousands of people at Crissy Field during high volume special events such as Fleet Week or Fourth of July as a large amount of open space (including grassy and dune areas) are heavily disturbed.

30) Mother Nature also plays a significant role at Crissy Field. During the winter months, the high tides and storms bring in a lot of debris (including several chairs, large pieces of old piers, a tricycle, several pounds of trash, at least a dozen dead birds that we pick up and put into trash cans, a dead sea lion, etc. this year alone) for at least six months a year. In addition, the fences along the west part of central beach protecting the dunes were flattened and leaving these areas vulnerable.

Proposed Suggestion

The Crissy Field Dog Group would like to propose a suggestion for off leash dog walking use at Crissy Field. On **weekends only (during HIGH use times)**, have time limitations for off leash dog walking on the **East Beach** and the **Promenade**. We suggest sunrise to 9am for off leash dog walking and from 9am to 4pm, dogs need to be on a leash in these areas and from 4pm to sundown, off leash dog walking resumes.

Again, thank you for the opportunity to comment on this very important document.

Martha Walters
Chair, Crissy Field Dog Group

GGNRA Management Plan

For

Visitors with Dogs

October 27, 2007

Submitted by the Following Committee Members and
Alternates Pursuant to the Final Version, May 15, 2006

Negotiated Rulemaking Protocols, page 2 as
“alternatives that reflect and incorporate, to the extent possible,
the various interests that have been expressed.”

Gary Fergus, Martha Walters, Linda McKay, Joseph Hague, Carol Copsey,
Cynthia Adam, Laurie Routhier, Christine Rosenblat, Jeri Flinn, and Cindy Machado.

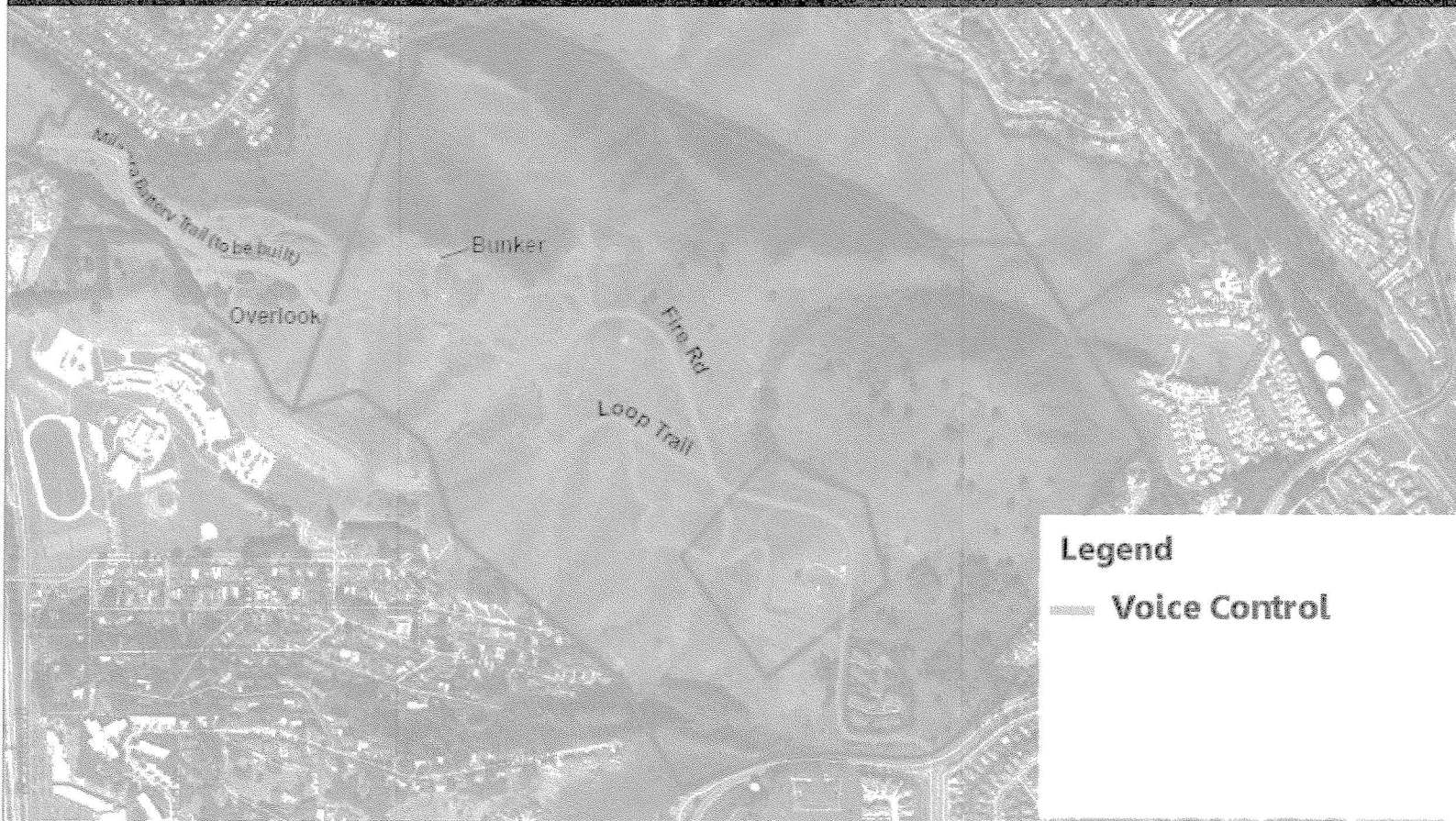
These materials are supported as indicated on the attached pages
by the following Committee Members and Alternates:

Keith McAllister, Judy Teichman, Holly Prehaska,

As corrected, October 31, 2007

National Park Service
U.S. Department of the Interior
Golden Gate National Recreation Area

Milagra Ridge Suggested Alternative

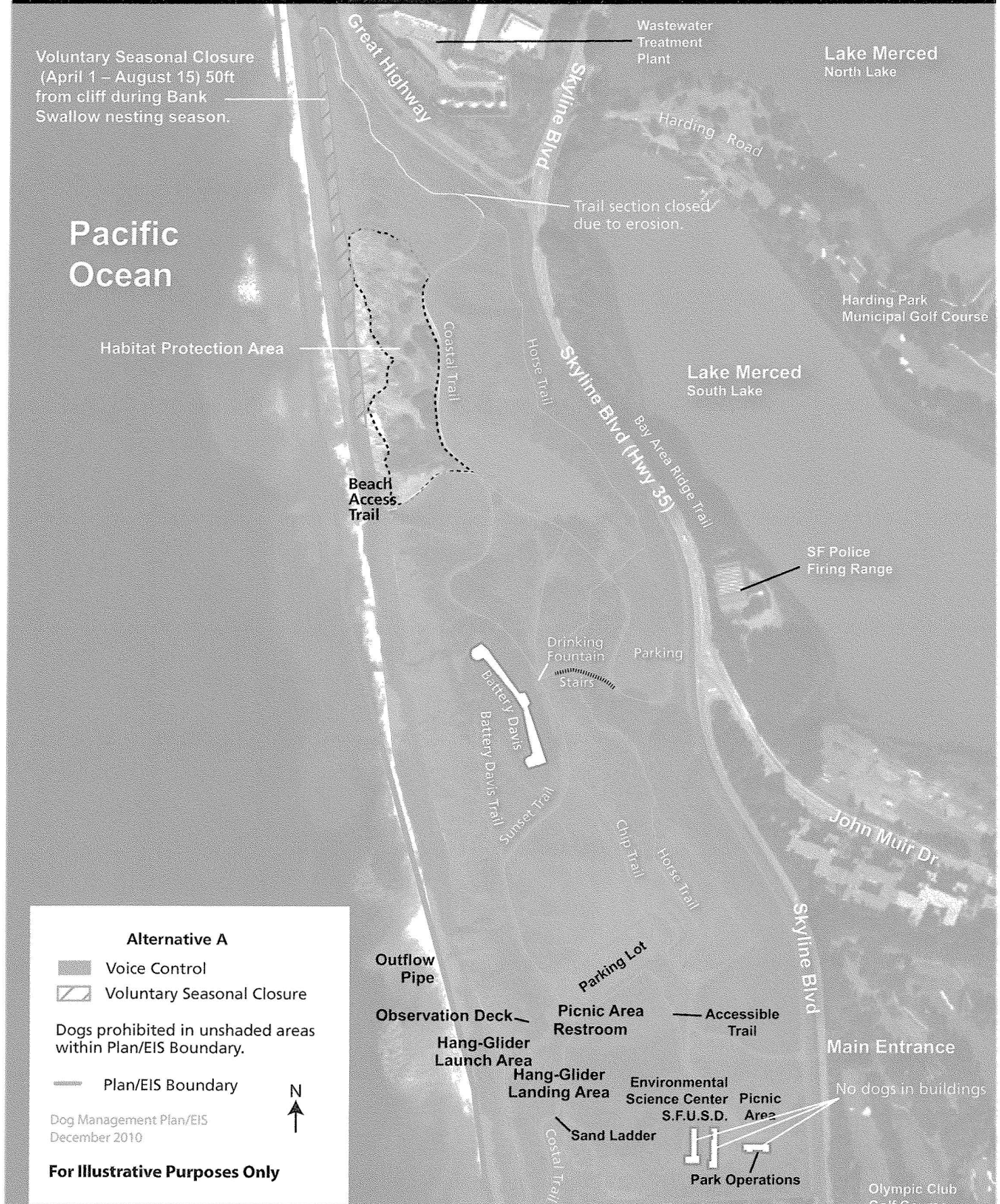
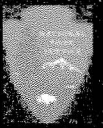


Legend

— Voice Control

new 5/28/11

Map 16-A: Fort Funston



replace

5/28/11